FINAL REPORT OF A MISSION

CARRIED OUT IN

BANGLADESH

FROM 02 TO 10 JUNE 2010

IN ORDER TO EVALUATE THE SYSTEM OF OFFICIAL CONTROLS AND THE CERTIFICATION OF PLANTS FOR EXPORT TO THE EUROPEAN UNION
Executive Summary

This report describes the outcome of a mission carried out in Bangladesh from 2 to 10 June 2010. The mission was undertaken in response to continued interceptions in the European Union (EU) of consignments of plants originating in Bangladesh, in particular for the presence of citrus canker (Xanthamonas axonopodis pv. citri) Thrips spp and non-European Tephritidae (fruit flies).

The objective of the mission was to evaluate the official controls and the export certification system for plants and plant products regulated by Council Directive 2000/29/EC, originating in Bangladesh and exported to the European Union (EU). Particular emphasis was given to those regulated plants and plant products that are hosts of non-European Tephritidae, Thysanoptera, and in particular Xanthomonas axonopodis, on citrus fruits.

The report concludes that:

There is a clear structure and division of responsibilities in the plant health service in Bangladesh. The organisms of concern to the EU, in particular citrus canker and citrus blackspot are known to occur in Bangladesh and no pest free areas have been established for these.

Action has been taken in response to the continued EU interceptions of harmful organisms on fruit and vegetables exported from Bangladesh, however the lack of traceability and use of exporter declarations, combined with the limited awareness of EU import requirements and harmful organisms of concern, and very limited laboratory and technical support for the NPPO and records of activities, means that the current system of official export checks does not ensure compliance with EU import requirements, and until the shortcomings identified are corrected, there will be a continued risk of introduction of harmful organisms to the EU. This is particularly so for Xanthamonas axonopodis and Guignardia citricarpa, on Citrus fruits.

The system in place for the implementation for the treatment of wood packaging material, as required by ISPM 15, is not subject to official supervision and control.

Recommendations are made in this report to address the shortcomings found.
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<th>Explanation</th>
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</thead>
<tbody>
<tr>
<td>BFVAPEA</td>
<td>Bangladesh Fruits, Vegetables and Allied Products Exporters Association</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>FVO</td>
<td>European Commission Food and Veterinary Office</td>
</tr>
<tr>
<td>Ha</td>
<td>Hectare</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'. It is synonymous with 'pest', sharing the same definition in ISPM N° 5. In the context of this report, this term particularly refers to those organisms listed in Section I, Part A, of Annexes I and II to Council Directive 2000/29/EC.</td>
</tr>
<tr>
<td>ISPM</td>
<td>International Standard for Phytosanitary Measures</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>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>Should be considered to mean 'all living plants and specified parts thereof, including seeds' as defined in Article 2(1)(a) of Council Directive 2000/29/EC</td>
</tr>
</tbody>
</table>
1 INTRODUCTION

This mission took place in Bangladesh from 2 to 10 June 2010 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 an EU Member State. Representatives from the National Plant Protection Organisation (NPPO), the Plant Protection Wing of the Ministry of Agriculture, accompanied the inspection team during the mission.

An opening meeting was held on 15 June 2009 at the headquarters of the NPPO in Dhaka, during which, the objectives and itinerary for the mission were confirmed by the inspection team, and additional information, necessary for the conduct of the mission, was requested.

2 OBJECTIVES OF THE MISSION

The objective of the mission was to evaluate the official controls and the export certification system for plants and plant products regulated by Council Directive 2000/29/EC, originating in Bangladesh and exported to the European Union (EU).

Particular emphasis was given to those regulated plants and plant products that are hosts of non-European Tephritidae, Thysanoptera, and in particular Xanthomonas axonopodis pv. citri, on citrus fruits.

The table below lists sites visited and meetings held in order to achieve these objectives:

<table>
<thead>
<tr>
<th>MEETINGS/VISITS</th>
<th>No.</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>COMPETENT AUTHORITIES</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Central</td>
<td>1</td>
<td>Plant Protection Wing, Dhaka</td>
</tr>
<tr>
<td>Regional</td>
<td>2</td>
<td>Plant Quarantine Sections, Norsignhdhi and Hazrat Shajalal International Airport, Dhaka.</td>
</tr>
<tr>
<td>Laboratories</td>
<td>1</td>
<td>Plant Protection Wing, Dhaka</td>
</tr>
<tr>
<td>PLANT HEALTH CONTROL SITES</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Production sites</td>
<td>4</td>
<td>Citrus, Momordica and egg plant (Solanum melongena) producers</td>
</tr>
<tr>
<td></td>
<td>1</td>
<td>Wood packaging treatment plant, Munsigonj</td>
</tr>
<tr>
<td>Scientific Institutes</td>
<td>1</td>
<td>Bangladesh Agricultural Research Institute, IPM and Pesticide facilities</td>
</tr>
<tr>
<td>Exporter Associations</td>
<td>2</td>
<td>Hortex and Bangladesh Fruits, Vegetables and Allied Products Exporters Association, Dhaka.</td>
</tr>
</tbody>
</table>

3 LEGAL BASIS FOR THE MISSION

The mission was carried out under the provisions of Articles 21 and 27(a) of Council Directive 2000/29/EC, and by agreement with the National Plant Protection Organisation of Bangladesh.

All Community legislation referred to in this report are listed in the Annex to this report. References to legislation are to the latest amended version, where applicable.

Article X (4) of the International Plant Protection Convention establishes that contracting parties should take into account, as appropriate, international standards when undertaking activities related to the Convention. The following International Standards for Phytosanitary Measures were of particular relevance to this mission:
Bangladesh is a contracting party to the IPPC.

The full text of all adopted ISPMs is available on the International Phytosanitary Portal of the International Plant Protection Convention (www.ippc.int).

4 BACKGROUND

This was the first mission carried out by the FVO to Bangladesh on plant health issues.

The mission was carried out in response to continued interceptions in the European Union due to the presence of harmful organisms including non-European Tephritidae (fruit flies) and Thysanoptera (Thrips) on a variety of plant products originating in Bangladesh, and in particular Xanthomonas axonopodis pv. citri (citrus canker) on citrus fruits.

These harmful organisms are included in Annex I Part A Section I of Council Directive 2000/29/EC and as such, are prohibited from entry and spread within the EU. The status and distribution of those harmful organisms of concern to the EU, in Bangladesh is detailed in section 6.2. below.

4.1 NOTIFICATIONS OF INTERCEPTION

Between 1 January 2006 to 31 May 2010, a total of 257 notifications of interceptions were reported by Member States in EUROPHYT, the EU's notification system for plant health. These included 144 due to the presence of harmful organisms.

The mission was carried out as a result of the increase in interceptions of citrus canker in recent years. During the above period, 60 such interceptions were reported (11 in 2010; 18 in 2009; 10 in 2008; 16 in 2007 and 5 in 2006). A further 18 interceptions were due to the presence of Thrips spp. (mainly Thrps palmi) and 3 were due to the presence of non-European Tephritidae.

During the reporting period, 8 interceptions were received due to the presence of citrus black spot (Guignardia citricarpa), from which the EU formally recognises Bangladesh as being free (see section 5.2. below)

4.2 PRODUCTION AND TRADE INFORMATION

Unless specified otherwise, the data quoted in the following sections and elsewhere in the report, was provided by the NPPO.

4.2.1 Production

The NPPO informed the mission team that agriculture is a fundamental part of the economy,
accounting for 22% of Gross Domestic Product and approximately 8% of exports. It also accounts for more than 60% of the employment in Bangladesh. The average size of places of production is 0.25 hectares. Agricultural production is focussed on the production of food crops; rice is the most important and is planted on 80% of the 13.3 million hectares of arable land available in Bangladesh. Production of cash crops, like sugar-cane and jute has declined, while at the same time there has been an increase in the production of fruit and vegetables, tea and spices. 6.2% of the total arable land is used for the production of horticultural crops, which drops to 3.2% if potato and spice production are excluded. Post-harvest losses for fresh fruits and vegetables are estimated to be in excess of 40%.

The majority of fruit and vegetables are sold via local markets or in markets and small shops in Dhaka. A variety of initiatives, including the Programme for Supply Chain Development, part-funded by the World Bank, are being implemented to reduce losses and improve the quality and quantity of fresh fruits and vegetables on the domestic market and for export.

Bangladesh has a tropical monsoon type climate; production of horticultural crops takes place throughout the country, but production of citrus fruits for export to the EU is centred around Sylhet in the north-east of the country and Norsinghdi, approximately 80 km north-east of Dhaka, with smaller volumes being produced in the neighbouring regions of Gazipur and Manikgani. Citrus production takes place throughout the year. Production of vegetables for export to the EU is concentrated in Jessore and Rogra in the west of the country and Comilla (south-east of Dhaka) and Gazipur and Manikgani. The following tables provide details of the production of key fruits and vegetables in Bangladesh:

### Table 1: Production of vegetables in Bangladesh 2007 – 2009

<table>
<thead>
<tr>
<th>Common name</th>
<th>Botanical name</th>
<th>Area (ha) and production (M.T)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>2007</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ha.</td>
</tr>
<tr>
<td>Sweet gourd</td>
<td>Cucurbita maxima</td>
<td>15,350</td>
</tr>
<tr>
<td>White gourd</td>
<td>Benincasa cerifera</td>
<td>14,555</td>
</tr>
<tr>
<td>Bottle gourd</td>
<td>Lageneria siceraria</td>
<td>29,327</td>
</tr>
<tr>
<td>Bitter gourd</td>
<td>Momordica charantia</td>
<td>12,210</td>
</tr>
<tr>
<td>Spiny gourd</td>
<td>Momordica cochinchinensis</td>
<td>8,150</td>
</tr>
<tr>
<td>Pointed gourd</td>
<td>Tricosanthes dioica</td>
<td>14,750</td>
</tr>
<tr>
<td>Snake gourd</td>
<td>Trichosanthes anguna</td>
<td>10,771</td>
</tr>
<tr>
<td>Ribbed gourd</td>
<td>Lufta acutangula</td>
<td>9,957</td>
</tr>
<tr>
<td>Yard bean</td>
<td>Vigna sinensis</td>
<td>9,770</td>
</tr>
<tr>
<td>Ladies finger</td>
<td>Abeimoschus esculentus</td>
<td>20,527</td>
</tr>
<tr>
<td>Brinjal</td>
<td>Solanum melongena</td>
<td>30,500</td>
</tr>
<tr>
<td>Spinach</td>
<td>Basella rubra</td>
<td>18,434</td>
</tr>
<tr>
<td>Amaranth</td>
<td>Amaranthus tricolor</td>
<td>20,342</td>
</tr>
<tr>
<td>Radish</td>
<td>Rephanus sativus</td>
<td>55,457</td>
</tr>
<tr>
<td>Corn</td>
<td>Colocasia sp.</td>
<td>15,789</td>
</tr>
<tr>
<td>Arum</td>
<td>Colocasia sp.</td>
<td>27,542</td>
</tr>
<tr>
<td>Chilli</td>
<td>Capsicum sp.</td>
<td>127,141</td>
</tr>
</tbody>
</table>
Table 2: Production of fruits in Bangladesh 2007 – 2009

<table>
<thead>
<tr>
<th>Name of fruits</th>
<th>Botanical name</th>
<th>Area planted (ha) and production (metric tonnes)</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>Citrus</td>
<td>Citrus spp.</td>
<td></td>
<td>15,150</td>
<td>115,750</td>
<td>7,980</td>
</tr>
<tr>
<td>Papaya</td>
<td>Carica papaya</td>
<td></td>
<td>18,125</td>
<td>320,432</td>
<td>14,344</td>
</tr>
<tr>
<td>Jackfruit</td>
<td>Artocarpus heterophylyus</td>
<td></td>
<td>49,523</td>
<td>1,125,164</td>
<td>41,417</td>
</tr>
<tr>
<td>Olive</td>
<td>Elacocarpus robustus</td>
<td></td>
<td>2,390</td>
<td>24,527</td>
<td>2,416</td>
</tr>
</tbody>
</table>

4.2.2 Exports

The main exports of plants and plant products from Bangladesh are Jute and Jute products, tea, tobacco, fresh and frozen vegetables and fruits, and aromatic spices. The main export markets for Bangladesh are the European Union and Middle East. The UK is the main market accounting for 42% of all exports, followed by Germany (8%) and Italy (4%). Almost all exports are destined for ethnic shops in these countries.

Based on data from the issue of phytosanitary certificates, the NPPO informed the mission team that there has been a steady increase in the amount in the total quantity of fresh fruit and vegetables exported from Bangladesh since 2006, as detailed in the following table.

Table 3: Total quantity of fresh fruits and vegetables exported between 2006 and 2009

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Fresh vegetables</td>
<td>10,036</td>
<td>14,463</td>
<td>46,736</td>
</tr>
<tr>
<td>Fresh fruits</td>
<td>502</td>
<td>302</td>
<td>1,075</td>
</tr>
</tbody>
</table>

The Bangladesh Fruits, Vegetables and Allied Products Exporters Association (see section 5.1.6. below) informed the mission team that a wide range of fresh fruits and vegetables are exported to the EU including Momordica (bitter gourd), Egg plant ('Brinjal') (Solanum melongena), Mango, various citrus fruits, and coriander, all of which are regulated by Directive 2000/29/EC. The export controls for these commodities are covered in section 5.3. below. The export of fruit and vegetables to the EU between 2007 and 2009 is detailed in the following table:
Table 4: Exports of fresh fruits and vegetables exported between 2006 and 2009

<table>
<thead>
<tr>
<th>Common name</th>
<th>Botanical name</th>
<th>Quantity (Metric Ton)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>2007</td>
</tr>
<tr>
<td>Okra</td>
<td><em>Abeimoschus esculentus</em></td>
<td>93</td>
</tr>
<tr>
<td>Bottle gourd</td>
<td><em>Lageneria siceraria</em></td>
<td>525</td>
</tr>
<tr>
<td>White gourd</td>
<td><em>Benincasa cerifera</em></td>
<td>400</td>
</tr>
<tr>
<td>Corn</td>
<td><em>Colocasia sp.</em></td>
<td>385</td>
</tr>
<tr>
<td>Snake gourd</td>
<td><em>Trichosanthes anguna</em></td>
<td>283</td>
</tr>
<tr>
<td>Ribbed gourd</td>
<td><em>Lufata acutangula</em></td>
<td>170</td>
</tr>
<tr>
<td>Brinjal</td>
<td><em>Solanum melongena</em></td>
<td>238</td>
</tr>
<tr>
<td>Bitter gourd</td>
<td><em>Momordica charanta</em></td>
<td>105</td>
</tr>
<tr>
<td>Amaranth</td>
<td><em>Amaranthus tricolor</em></td>
<td>385</td>
</tr>
<tr>
<td>Beans</td>
<td><em>Dolichos lablab</em></td>
<td>196</td>
</tr>
<tr>
<td>Spiny gourd</td>
<td><em>Momordica cochinchenensis</em></td>
<td>75</td>
</tr>
<tr>
<td>Pointed gourd</td>
<td><em>Trichosanthes dioica</em></td>
<td>245</td>
</tr>
<tr>
<td>Yard bean</td>
<td><em>Vigna sinensis</em></td>
<td>107</td>
</tr>
<tr>
<td>Spinach</td>
<td><em>Basella rubra</em></td>
<td>38</td>
</tr>
<tr>
<td>Leaf of Amaranth</td>
<td><em>Amaranthus sp.</em></td>
<td>44</td>
</tr>
<tr>
<td>Red Amaranth</td>
<td><em>Amaranthus sp.</em></td>
<td>29</td>
</tr>
<tr>
<td>Corn</td>
<td><em>Colocasia sp.</em></td>
<td>257</td>
</tr>
<tr>
<td>Radish</td>
<td><em>Rephanus sativus</em></td>
<td>143</td>
</tr>
<tr>
<td>Kangkong/Swamp Cabbage</td>
<td><em>Ipomea sp.</em></td>
<td>27</td>
</tr>
<tr>
<td>Green Chilli</td>
<td><em>Capsicum sp.</em></td>
<td>20</td>
</tr>
<tr>
<td>Indian Spinach</td>
<td><em>Spinacea oleracea.</em></td>
<td>15</td>
</tr>
<tr>
<td>Sweet gourd</td>
<td><em>Cucurbita maxima</em></td>
<td>135</td>
</tr>
<tr>
<td>Stolon of Colocasia</td>
<td><em>Colocasia sp.</em></td>
<td>565</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td></td>
<td>4,753</td>
</tr>
</tbody>
</table>

The NPPO informed the mission team that citrus exports were officially suspended from 2008 until February 2010, due to the EU interceptions of citrus canker; no phytosanitary certificates were issued for citrus fruit. Data from EUROSTAT indicates however, that during this period, 24.5 tonnes of *Citrus* was officially declared on entry to the EU during this period.

All fresh fruit and vegetables exported to the EU are transported by air from Hazrat Shah Jalal International Airport in Dhaka, usually via airports in the Middle East. The NPPO and BFAPEA informed the mission team that the lack of air freight capacity is currently the limiting factor for increasing export volumes.

The NPPO informed the mission team that export channels are mainly controlled by 'middle-men' and the links between producers and exports are very weak. Recent changes to the general export system (see section 5.3.2. below) are intended to improve traceability.
5 Findings And Conclusions

5.1 Organisational aspects of plant health controls

Legal requirements:

Article 2(1)(i) of Council Directive 2000/29/EC establishes the requirements for a measure or statement, to be considered as ‘official’. In particular, ‘…if it is made by representatives of the official national plant protection organisation of a third country, or, under their responsibility, by other public officers who are technically qualified and duly authorised…’

ISPM 7 describes the basic elements of the phytosanitary certification process and the requirements for a certification system to fulfil these functions. Sections 1 (Legal Authority), 2 (Management responsibility), 3 (Resources), 4.3 (Procedures), 5 (Communication) and 6 (Review mechanism) are of particular relevance.

ISPM 23 describes the objectives and requirements for inspections. Of particular relevance here, is sections 1.3 (responsibility for inspection) and 1.4 (Requirements for inspectors).

5.1.1 National Plant Protection Organisation

The National Plant Protection Organisation (NPPO) of Bangladesh is the Plant Protection Wing of the Department of Agricultural Extension, which is part of the Ministry of Agriculture. The Plant Protection Wing is sub-divided into four sections, each headed by a Deputy Director: Plant Quarantine, Pesticide Administration and Quality Control, Surveillance and Operations.

Plant Quarantine Section:
The section is responsible for the inspection of imported and exported plants and plant products, and for the issue of phytosanitary certificates. Inspectors are based at 12 border inspection posts and 10 quarantine stations.

The section is also responsible for issuing import permits and Release Orders for imported plant commodities.

Surveillance and Forecasting Section:

This section is responsible for collecting, analysing and interpreting data regarding the incidence and severity of pests and diseases in Bangladesh and for forecasting and providing early warning of occurrences of pests and diseases.

Operations Section:

This section is responsible for carrying out and monitoring pest control programmes.

Official controls for plant health, including exports to the EU are only carried out by officials from the Plant Protection Wing.

➢ The mission team noted that in many cases, there were no records kept of the NPPO activities, and in many cases it was not therefore possible to verify the level of controls carried out.
5.1.2 Laboratories and diagnostic support

Each Plant Quarantine Station has a laboratory for equipped to carry out initial screening of samples. In addition, there is one laboratory at the headquarters of the Plant Protection Wing in Dhaka, which acts as the national reference laboratory for plant health.

➢ The mission team visited the laboratories at the headquarters of the Plant Protection Wing in Dhaka and noted that although the laboratory had recently been refurbished it is equipped primarily for conducting screening type tests for insects and nematodes, with only very limited diagnostic capacity for mycology and bacteriology.

5.1.3 Legislation

The legal basis for the controls carried out by the Plant Protection Wing is the Destructive Insects and Pests Rule 1966(Plant Quarantine), as amended July, 1989.

According to Article 29 of the Rule, every person who intends to export plants and plant products should submit an application for inspection of the plants or plant products before shipment. The application should be made at least one day before the shipment in case of perishable goods and fifteen days in case of non-perishable goods so as to allow proper inspection and treatment (if required) and certification.

The same Article provides that if the plant or plant product is found to be free from injurious insect and plant diseases, a phytosanitary certificate shall be issued by the Director of Plant Quarantine and specifies that no certificate shall be issued for any plant or plant product which has been taken from or mixed with other plants or plant products which are diseased or infested, or for any plant or plant product, intended for shipment to a country in which its entrance is prohibited.

The related costs of inspection, fumigation or or destruction of plants or plant products must be provided or borne by the exporter.

5.1.4 Human and financial resources

The number of staff employed by each section of the Plant Protection Wing and their educational profile is detailed in the following table:

**Table 5: Number of staff employed by the Plant Protection Wing and their educational profiles**

<table>
<thead>
<tr>
<th>Name of Section</th>
<th>Professional Staff</th>
<th>Support Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Number</td>
<td>Educational Profile</td>
</tr>
<tr>
<td>Plant Quarantine</td>
<td>50</td>
<td>Graduates-18 Diploma-32</td>
</tr>
<tr>
<td>Pesticide Administration &amp; Quality Control</td>
<td>9</td>
<td>Graduates-5 Diploma-4</td>
</tr>
<tr>
<td>Surveillance</td>
<td>6</td>
<td>Graduates-2 Diploma-4</td>
</tr>
<tr>
<td>Operation</td>
<td>21</td>
<td>Graduates-10 Diploma-11</td>
</tr>
<tr>
<td>Total</td>
<td>86</td>
<td>-</td>
</tr>
</tbody>
</table>

The financial resources for the Plant Protection Wing are provided from the State budget. There is no provision for contingency funding in the event of an emergency.
➢ The mission team noted that there appeared to be adequate staff for the current export control system for exports to the EU.

5.1.5 Guidelines and training

The NPPO informed the mission team that the following guidelines and technical literature have been provided to staff responsible for export controls:

Table 6: Guidelines and technical literature provided to staff responsible for export controls.

<table>
<thead>
<tr>
<th>Description</th>
<th>Year printed</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plant Quarantine Training Manual</td>
<td>March 2000</td>
</tr>
<tr>
<td>Detection of Quarantine Pests and Diseases</td>
<td>November 2000</td>
</tr>
<tr>
<td>Quarantine Handbook</td>
<td>June 2009</td>
</tr>
<tr>
<td>Directives for Exporters (Leaflets)</td>
<td>June 2009</td>
</tr>
<tr>
<td>Directives for Importers (Leaflets)</td>
<td>June 2009</td>
</tr>
</tbody>
</table>

The NPPO also stated that regular training is provided for the above staff; the first of two courses held in May 2010 on the subject of Phytosanitary Capacity Building, provided training for 20 officers from the Plant Quarantine Section. The second course provided training for 30 exporters.

➢ The mission team noted that the inspectors responsible for performing the pre-export checks for consignments intended for export to the EU were not familiar with the harmful organisms of concern, and in particular, the symptoms of citrus canker and citrus blackspot.

5.1.6 Communication and consultation with stakeholders

There are a number of associations that play an important role in the export of plants to the EU, in particular, the following:

Bangladesh Fruits, Vegetables and Allied Products Exporters Association (BFVAPEA)

The BFVAPEA informed the mission team that it is a unique organisation in Bangladesh that represents exporters of fresh fruit and vegetables. It was established in 1984 and has 680 members.

The objectives of the Association are to promote exports and enhance trade and business knowledge for perishable horticultural products as well as to provide a site for exporters to sort and pack their consignments. The representatives met by the mission team reported that there are 32 regular exporters to the EU and that exporters do not have their own sorting and packing facilities.

The Association is located close to the cargo terminal of Hazrat Shah Jalal International Airport, and inspection facilities and an office are provided for the Plant Quarantine Section. It is intended to open a new Central Distribution and Packaging Facility at Hazrat Shah Jalal International Airport to replace the existing facility. This will include improved office, inspection and laboratory facilities for the Plant Quarantine. The Central Facility will be linked with a number of Regional Post-Harvest Supply Cain Development Centres located in the key production areas.

➢ The BFVAPEA representatives informed the mission team that they are regularly consulted by the Plant Protection Wing over any proposed changes to procedures or export related problems.

Hortex Foundation

The Hortex Export Development Foundation was established in 1993 as a non-profit organisation for the development, promotion and marketing of high value agricultural products for export. The
Foundation is governed by a 7 member Governing Body that includes two members from the Ministry of Agriculture and the Export Promotion Body, and five members from private sector organisations including NGO's. Its main roles are to provide technical assistance on production, post-harvest management and processing, and cool chain management services. Standard packaging materials have been made available in an effort to reduce the estimated 40% losses in exported consignment linked to poor packaging and in particular, poor aeration.

➢ The representatives of Hortex met by the mission confirmed that they are regularly consulted by the Plant Protection Wing with regards to export related issues.

The NPPO informed the mission team that they had arranged a meeting with all stakeholders in early July in order to discuss the shortcomings identified during the mission.

Conclusions for Organisational Aspects

There is a clear structure and division of responsibilities within the plant health service. No tasks have been delegated and legislation is in place that should enable the NPPO to carry out its tasks effectively in line with the relevant international standards. However records of activities are not maintained, as required by Section 4.4. of ISPM 7.

A range of guidelines and technical literature and training have been provided for inspectors, however their knowledge of EU import requirements and relevant harmful organisms is limited. There is also only very limited laboratory and diagnostic support available for the NPPO.

The NPPO has established good communication with the relevant exporters associations.

5.2 Phytosanitary Status

Legal requirements:

Annex I Part A Section I and Annex II Part A Section I to Council Directive 2000/29/EC list those harmful organisms that are not known to occur in the Community, and whose introduction and movement within the Community is banned. These organisms include citrus canker, citrus blackspot and non-European Tephritidae.

In addition, Points 16(4) and 16 (5) of Annex IV Part A Section I to Directive 2000/29/EC establishes specific requirements, with respect to citrus canker, citrus blackspot and fruit flies, which must be met in order for citrus fruits to be exported to the European Union. These vary, depending on the status of the relevant diseases in the country of origin.

Commission Decision 2006/473/EC recognises Bangladesh as being free from citrus blackspot (Guignardia citricarpa (all strains pathogenic to citrus)) and Cercospora angolensis. The EU does not recognise any areas of Bangladesh as being free from citrus canker (Xanthomonas axonopodis pv. citri).

ISPM 4 details the requirements for the establishment of pest free areas. In particular, Section 1.2 includes the three components in establishing and maintaining a pest free area: systems to establish freedom (surveys and general surveillance), phytosanitary measures to maintain freedom, and checks to verify freedom has been maintained.

ISPM 6 establishes guidelines for surveillance.

ISPM 8 describes the use of pest records and other information in the determination of pest status in an area.
Findings:
The mission was carried out in response to continued interceptions in the European Union due to the presence of harmful organisms in particular citrus canker as well as non-European Tephritidae and Thysanoptera on a variety of plant products exported from Bangladesh.

➢ The mission team visited the Bangladesh Agricultural Research Institute in Gazipur, where research and development of biological and integrated pest management programmes for agricultural and horticultural pests is carried out. The stated intention of the NPPO is to reduce the use of pesticides to reduce environmental impacts and the costs of crop production. It was noted that there is a good level of expertise and international cooperation. Biological control agents have been identified for most of the insects of concern to the EU.

The NPPO provided the following information on the status of EU harmful organisms of relevance to this mission. No pest free areas have been established for these organisms. Control measures are required to be taken by those producers intending to export their production to the EU.

Citrus canker
*Xanthomonas axonopodis* pv. *citri* is present in Bangladesh, but is not widespread, and where it occurs, this is at a low incidence.

Surveys are carried out for the presence of *X. axonopodis* in areas exporting citrus to the EU. According to the Surveillance and Forecasting Section, five production units are selected from each *upazila* (sub-district) and 0.2 hectares of each block are are selected at random and subjected to inspection.

The NPPO informed the mission team that the disease has only been found in old orchards in the Sylhet area. No signs of the disease have been found in the Norsinghdi area.

The management of citrus canker is based primarily on suppression of the citrus leafminer (*Phyllocnistis citrella*) in order to reduce leaf damage in orchards.

*Thrips palmi*

The NPPO informed the mission team that *Thrips palmi* were until recently, found mainly in mung bean (*Vigna radiata*) but is now found more widely on egg plant (*Solanum melongena*).

Citrus blackspot
*Guignardia citricarpa* is present in Bangladesh; no pest free areas have been established for this organism. The NPPO stated that it is considered to be a minor disease that is managed through a combination of orchard husbandry and the application of carbendazim based fungicides.

Fruit flies
A wide range of Tephritidae are also known to be present in Bangladesh including *Dacus longicornis*, *Bactrocera dorsalis* and *B. zonata*. The NPPO also indicated that *B. invadens* may be present, although this has not been confirmed. *B. dorsalis* and to a lesser extent, *B. zonata* are found in citrus production.

The management of fruit flies is based on the use of mass pheromone trapping. Sterile male release has been trialled, but was not effective.

Other organisms of concern
Other harmful organisms of concern to the EU that are known to be present in Bangladesh include *Leucinodes orbonalis* (Eggplant fruit borer) and *Diaphania indica* (Cucumber moth). Integrated pest management programmes, focussed on biological control, have been developed for these organisms, which are major pests in Bangladesh. The mission team visited farms producing
Momordica and S. Melongera using the biological controls and both the local inspectors and the producers reported very good results.

Leafminers (Liriomyza spp.) are also widespread in Bangladesh. Biological controls are still under development for these pests and if control is required, conventional pesticides are usually applied. The NPPO stated that Cercospora angolensis is not present in Bangladesh.

Anoplophora glabripennis and Bursaphelenchus xylophilus, two pests of major concern for the EU in respect of imported wood packaging material, are not known to occur in Bangladesh.

**Conclusions:**

Harmful organisms of concern to the EU are present in Bangladesh and widespread. This includes Guignardia citricarpa, which the EU currently recognises Bangladesh as being free from. No pest free areas have been established, although control measures are required for those producers intending to export their produce.

Control of harmful organisms at the place of production is not an explicit requirement for export of most produce to the EU, but such controls may help to ensure that the product presented for export certification is free and can be certified.

### 5.3 Export controls and traceability

**Legal requirements:**
Annex I Part A Section I and Annex II Part A section I to Council Directive 2000/29/EC list those harmful organisms that are not known to occur in the Community, and whose introduction and movement within the Community is banned.

In addition, Annex IV Part A Section I to Directive 2000/29/EC establishes specific requirements for plants and plant products, which must be met in order to exported to the European Union. These vary, depending on the status of the relevant diseases in the country of origin.

Point 16(2) of Annex IV Part A Section I to Directive 2000/29/EC establishes specific requirements, with respect to *Xanthomonas axonopodis* pv. *citri*, which must be met in order for fruits of *Citrus, Fortunella, Poncirus* and their hybrids to be exported to the EU.

Section 4.5 of ISPM 7 establishes that consignments and their certification should be traceable as appropriate through all stages of production, handling and transport to the point of exit.

ISPM 23 establishes guidelines for inspection.

ISPM 31 establishes methodologies for sampling of consignments.

ISPM 12 establishes guidelines for phytosanitary certificates.

Article 2(1)(i) of Council Directive 2000/29/EC specifies the requirements that must be met in order for a statement or measure to be considered as official. Articles 13a(3) and 13a(4) of the same Directive contain specific requirements relating to phytosanitary certificates. In particular, Article 13a(4)(b) contains requirements relating to the use of additional declarations on phytosanitary certificates.

ISPM 7, Section 6.2. (Incident review) requires that the NPPO should establish procedures for investigating reports from importing countries of non-conforming consignments covered by a phytosanitary certificate.

5.3.1 General export procedures

Findings:

The NPPO informed the mission team that the system of export controls for consignments destined for the EU had recently been changed in order to try to address the continued interceptions reported by EU Member States. The following system is effective from April 2010:

- The exporter must submit an application for inspection, a minimum of 24 hours prior to intended export.
- The consignment must be presented to the Plant Quarantine Section at the BFVAPeA facility at Hazrat Shah Jalal International Airport in Dhaka for inspection and packing. No inspections are carried out at exporters premises and consignments must be packed at the airport, using boxes provided by the exporter.
- Consignments of *Citrus*, eggplants and *Momordica* intended for export to the EU should be accompanied either by an exporter declaration that the fruit complies with the EU’s import requirements, or a certificate issued by the district office of the Plant Quarantine Section (see section 5.4.1. below). The use of such declarations is at the discretion of the exporter.
- Inspectors from the Plant Quarantine Section inspect a sample of each lot in the consignment. Any items showing signs of an EU harmful organism are removed from the lot. *Citrus* fruit is subjected to a treatment against citrus canker.
- Consignments are packed on the premises and a phytosanitary certificate is issued by the
The mission team noted during two visits to the BFVAPEA facility that applications for inspection were frequently not submitted in advance as required, and that exporters frequently presented incomplete documentation to the Plant Quarantine Section, which had been accepted. Phytosanitary certificates are also issued based on the information provided by exporters (see section 5.4.3. below).

Conclusions:
The general export procedures have been changed in light of continued notifications of interception, which is in line with the principles of ISPM 7. However, not all exporters comply with the export procedures, in particular regarding advanced notification of export. In addition, the revised system relies in part, on declarations by exporters that Citrus fruits comply with the EU's import requirements, instead of the official control and examination regime required by point 16.2(c) of Annex IV Part A Section I to Directive 2000/29/EC, in order for such fruit to be exported to the EU. This aspect is covered in more detail in the following sections.

5.3.2 Registration and traceability of consignments

Findings:
Currently, there is no obligatory registration of producers or exporters for phytosanitary purposes and, generally, there are no requirements to ensure traceability of consignments. The Ministry of Agriculture stated at the closing meeting that a general registration of all farmers, including the issuance of a “farmer's card” with a unique registration number has started; 9 million of the 18 million farmers in Bangladesh had been registered.

• The mission team noted that no reference was made by anyone during the field visits to this registration and the commodities/packaging seen was not marked with any farmer's registration number.

For eggplant, Momordica and citrus intended for export to the EU, a scheme has recently been introduced where exporters must provide the NPPO with details of their contract farmers. When a consignment is presented for export certification, it is accompanied by a written declaration from the exporter that it originates from his contract farmers, is free from relevant pests and diseases and (for citrus) that it has been treated as required. The NPPO stated that this scheme was introduced as a temporary solution for re-opening the certification of citrus for export to the EU after it had been suspended. The NPPO informed the mission team that if the consignment was found to be non-compliant the exporter would be suspended.

For the same commodities, an alternative scheme has been initiated in March 2010, which is intended to replace the exporters' declarations scheme. This involves inspection at farm level by the NPPO's field inspectors and subsequent declaration of pest freedom in written form for each consignment from the relevant NPPO sub-district office.

The mission team discussed these schemes with the NPPO in the field and at the point of export certification and noted:

• The wording of the exporters' declaration is at the exporter's discretion and is not required to include details of the specific farm or field of origin of the fruit. In the examples shown to the mission team, there was no information that would enable traceability of the fruit. The exporter's declaration of pest freedom is not necessarily based on any official inspection of the field of production or the consignment;

• The field inspector declaration scheme enables trace-back to farm/field level, but it covers so
far only a minority of the exports;

- Citrus consignments had been certified recently for export to the EU without either the exporter's declaration or the field inspector's declaration.

The mission team noted that the majority of packaging for citrus fruits do not include an origin mark.

**Conclusions:**

There is currently no requirement for registration or traceability as laid down by ISPM 7 (section 4.5) and it is not possible for the NPPO to determine the true origin of citrus fruit, in particular that exported under the exporter declaration system. It is therefore not possible to ensure that citrus fruit exported to the EU complies with the requirements of item 16(2)(e) and 16(4)(c) or (d) of Part I, Section I of Annex IV to Directive 2000/29/EC (see also section 5.4.3. below). The lack of an origin mark on the majority of packages for citrus fruit is also not in line with the requirements of point 16(1) of the same Annex. Initiatives are being taken to increase the traceability for key export commodities.

### 5.4 Export checks

The mission team evaluated the export checks carried out at the place of production and at the point of exit.

#### 5.4.1 Export checks at place of production

**Legal requirements:**

In addition to the legal requirements cited in section 5.2. above, points:16.2 and 16.4 of Part I, Section I of Annex to Directive 2000/29/EC establish special measures that have to be complied with in order to export citrus fruit to the EU. These relate to *Xanthomonas axonopodis pv. citri*; and *Guignardia citricarpa*. In countries and areas where these diseases are known to be present official inspections of the places of production are required. There are also requirements relating to non-European Tephritidae in point 16.5 of the same Annex, which require either official inspections at the place of production, or an official examination immediately prior to export.

**Findings:**

As noted in section 5.3.2. above, there are two schemes in place for the export of *Citrus*, *Momordica* and eggplants, one based on exporter declarations and one that requires the inspection of place of production for these commodities. The EU requires such inspections for *Citrus* fruit. It was not possible to confirm what proportion of fruit is exported based on an exporter's declaration.

The mission team visited producers of citrus fruit, *Momordica* and eggplants, whose products are currently exported to the EU and met with local inspectors responsible for carrying out the field inspections in the Norsinghdi area. Fruit originating in this area has been intercepted on entry to the EU due to the presence of citrus canker and citrus black spot.

The inspectors informed the mission team that each citrus orchard was visited at least once every week during the export season, and that a small part of the orchard is inspected during each visit. The inspector informed the mission team that he was aware of the symptoms of citrus canker but had never seen any signs of it in orchards in the area. The producer stated that no control measures were applied for citrus leaf miner, although this was active in the orchards, because citrus canker had not been observed in the area. The producer also did not apply carbenzamine as no citrus
blackspot had been found either. The mission team noted that effective treatment would be very difficult given the dense planting and dense foliage.

Citrus fruit is subjected to a post-harvest treatment during inspection, immediately prior to export, at the BFVAPEA facility at Hazrat Shah Jalal International Airport in Dhaka. The mission team observed fruit being treated at the airport. Fruit is soaked in fresh water before being transferred to a 5% solution of Citrox ProGarda in small basins. The fruit was soaked for 5 minutes before being removed and inspected. The NPPO stated that the use of Cirox ProGarda, which is marketed as a surface disinfectant for fruits and vegetables (see www.citrox.net), as a post-harvest treatment for citrus canker was based on information provided by exporters, including the manufacturer's sales literature, and that its effectiveness against citrus canker had not been verified.

- During the field visits to the producers of *Momordica* and eggplants it was noted that the emphasis of the inspections was for *Leucinodes orbonalis* and that *Thrips* are not a major concern for producers or the local inspectors, although these appeared widespread and common in *Momordica* crops; a product that *Thrips* are frequently intercepted on, by the EU.

The inspectors informed the mission team that a record of the inspection is kept at the local office, although such records were not available in the office visited.

**Conclusions:**

Citrus fruit is being exported to the EU, based either on official inspections at place of production, or an exporter's declaration. The latter is a temporary scheme intended to facilitate exports, however citrus fruit exported on this basis does not comply with the EU's import requirements for such fruit; in particular, the official inspections of the place of production and the fruit harvested there, have not been carried out as required by item 16.2(c) of Section I, Part A of Annex IV to Directive 2000/29/EC. As previously noted, traceability is not ensured with such declarations and so it is not possible to ensure that fruit even originates from one of the exporter's contract farmers.

Where official field inspections are carried out, it was noted that no symptoms of citrus canker have been observed in the field. The disease is difficult to spot in field conditions, however EU interceptions of symptomatic fruit from the visited area indicate that the fact that no symptoms have been found may also be due to shortcomings in the inspections or in the knowledge of the inspectors.

Citrus fruit is subject to post–harvest treatment and inspection at the point of exit, however there is no evidence that the applied treatment is effective against citrus canker, and in light of the continued EU interceptions of citrus canker on treated fruit, it cannot, without verification, be considered to be an appropriate treatment as required by item 16.2(c) of Part A, Section I of Annex IV to Directive 2000/29/EC. The inspections at point of exit are covered in the following section.

No additional measures are applied regarding Citrus blackspot. This is technically in line with item 16.4(a) of Part A, Section I of Annex IV to Directive 2000/29/EC, since Bangladesh is currently recognised by the EU as being free from this disease. However, since the NPPO has declared that Citrus blackspot is present and no pest free areas have been established, there is a risk of introducing Citrus blackspot into the EU, unless the requirements of either item 16.4(c) or item 16.4(d) of Part I, Section I of Annex IV to Directive 2000/29/EC have been complied with.

Considering the lack of traceability already noted, and the shortcomings in the inspection and treatment regime, it must be concluded that the system does not comply with the EU's import requirements for citrus fruit.

Field inspections have been introduced for eggplants and *Momordica*, while these are not required for export to the EU, such checks may provide additional assurance regarding the plant health status.
of such exports, if the EU harmful organisms of concern are included in these checks.

5.4.2 Export checks at point of exit

Legal requirements:
In addition to the general requirement for freedom from harmful organisms listed in the annexes to Directive 2000/29/EC, point 36.2 of Annex IV of the same directive lists specific requirements that should be fulfilled for the export of *Momordica* and *Solanum melongena* in respect of *Thrips palmi*. There are two options: either the country must be free from the organism or the fruits must have been officially inspected immediately prior to export and found free from the organism.

Findings:
The mission team visited the Plant Quarantine Section at the BFVAPEA facility in the cargo area. This facility includes an inspection room and office for the Plant Quarantine Section, an loading area and a large cool chamber for storing consignments pending export. A room was also set aside for a plant health laboratory.

- During two visits to Hazrat Shah Jalal International Airport in Dhaka, the mission team observed export checks of various fruits and vegetables and noted that:
  - All fruit and vegetables intended for export to the EU, are subject to inspection.
  - The inspectors had access to only limited equipment and technical literature. In particular, the lighting was inadequate for meticulous inspections and this was limited further by frequent interruptions to the power supply. The NPPO also informed the mission team that it is not currently possible to unload consignments when it is raining, due to the lack of shelter and covered storage space.
  - The office is equipped with a computer and printer used for issuing phytosanitary certificates (see section 5.4.3. below).
  - Inspectors appeared able to identify symptoms of fruit flies, but were not familiar with other EU harmful organisms, in particular *Thrips palmi*, or the symptoms of citrus canker and blackspot. The mission team identified symptoms of citrus canker on fruit that had been treated and inspected, but these were not recognised as such by the inspectors and the lot was exported to the EU. The mission team took samples of the symptomatic fruit which was confirmed after the mission to be infected with citrus canker, following analysis by the Central Science Laboratory in the U.K.
  - The size of the sample that is taken to be inspected varies between 5 – 10 % of each lot of EU regulated material.
  - The inspectors stated that if a harmful organism or blemishes were found during the inspection, that the individual items would be discarded. No further samples are taken from the remainder of each lot, which is permitted to be exported.
  - The majority of consignments are presented within a narrow time-frame and often at short notice, due to restricted air freight capacity. The inspection room was frequently inundated with exporters and consignments awaiting inspection and awaiting packaging.

Conclusions:
An official inspection is carried out for all fruit and vegetables immediately prior to export, which in particular, is in line with EU requirements for *Momordica* and eggplants. However, the effectiveness of the checks is significantly compromised by the lack of facilities and the low awareness of EU
harmful organisms and their symptoms, in particular citrus canker and *Thrips palmi*.

The sample size taken from each lot is broadly in line with the principles of ISPM 31, however if a harmful organism is found in the samples, the infected items in that sample are removed and the remainder of the lot is considered to be free from the harmful organism. This is not in line with ISPM 23 or 31, or the EU's import requirements for citrus fruit (16.2(c) and 16.4 (d), which require that none of the fruit harvested have shown symptoms of citrus canker or citrus blackspot, or other items of the same Annex for other regulated fruit and vegetables, including items 32.2 and 45.2 of Annex IV Part A Section I to Council Directive 2000/29/EC, which require that ‘immediately prior to their export (the lots) have been officially inspected and found free from …(the pest)’. ISPM No 5 defines ‘free from’ as being “…without pests (or a specific pest) in numbers or quantities that can be detected by the application of phytosanitary procedures”, and therefore, in instances where a pest has been found, the whole lot should not be considered as being free from the pest, and should be prohibited from export.

5.4.3 Issue of phytosanitary certificates

**Legal requirements:**

ISPM 12 establishes guidelines for phytosanitary certificates.

Article 2(1)(i) of Council Directive 2000/29/EC specifies the requirements that must be met in order for a statement or measure to be considered as official. Articles 13a(3) and 13a(4) of the same Directive contain specific requirements relating to phytosanitary certificates, in particular, Article 13a(4)(b) contains requirements relating to the use of additional declarations on phytosanitary certificates.

**Findings:**

Phytosanitary certificates are issued only by the NPPO. The mission team observed the issuing of phytosanitary certificates at Hazrat Shah Jalal International Airport, and noted that:

- Blank phytosanitary certificates are kept securely by the Plant Quarantine Section. All certificates are signed and endorsed by the Deputy Director of Plant Quarantine who is responsible for Hazrat Shah Jalal International Airport.

- The phytosanitary certificates are completed by inspectors from the Plant Quarantine Section, based on information provided by the exporter, using a computer. A separate hand written register of certificates issued is also maintained.

- The Deputy Director did not have access to the list of suspended exporters (see section 5.4.4. below), and the team noted that a phytosanitary certificate had been issued for one of the three suspended exporters.

- The additional declarations for the commodities are copied from a file maintained in the computer. The mission team noted that for citrus fruits, items 16.2(c) is used (indicating that the place of production has been inspected and that none of the fruit harvested has sown signs of citrus canker) even for consignments accompanied by exporters declarations.

The mission team and NPPO also compared copies of phytosanitary certificates presented at Frankfurt and Heathrow Airports that were suspected of having been altered after export, with the originals kept by the NPPO. The comparison revealed that the attached lists for the certificates presented in the EU, which include details of the exported commodities, had been altered in many cases to include additional commodities, in particular citrus, or increased quantities of certain commodities. Other certificates included obvious alterations to the date of issue, total quantities and the additional declarations.
The NPPO stated that no phytosanitary certificates are issued with alterations; if changes are required then a new certificate is always issued; the NPPO insisted that EU Member States should regard certificates with alterations as being invalid.

In addition, the NPPO was also able to confirm that the stamps used to endorse the altered attached lists and certificates were fake, although the differences were only slight.

Following the discussion and resulted discovery of several cases of fraud, the NPPO immediately suspended two exporters that were involved and also informed the mission team that the list of commodities in the consignment would be printed on the reverse side of the phytosanitary certificate, instead of being attached as before, with immediate effect.

**Conclusions:**

The process for the issuing of phytosanitary certificates is in line with the provisions of ISPM 12. Phytosanitary certificates for citrus fruits are in certain cases, issued based on declarations by exporters. Such declarations cannot be considered to be 'official checks' or 'official statements' as defined by Article 2(1)(i) of Directive 2000/29/EC, for the purposes of issuing phytosanitary certificates and in particular, to fulfil the requirements indicated by the additional declarations used for Citrus fruits.

Action has been taken to reduce the level of fraudulent phytosanitary certificates.

5.4.4  **Action taken in response to notification of interceptions**

**Legal requirements**

ISPM 7, Section 5.1. provides that the NPPO may put in place, for non-conforming consignments, a procedure which enable rapid communication to all affected industry parties and certification personnel in order to facilitate resolution of the problem.

ISPM 7, Section 6.2. provides that the NPPO should establish procedures for investigating reports from importing countries of non-conforming consignments covered by a phytosanitary certificate.

**Findings:**

The NPPO informed the mission team that action is taken following receipt of a notification of interception from the EU. The Deputy Director of the Plant Quarantine Section informs the relevant exporter of the interception and requests an explanation. If a satisfactory explanation is not provided, the exporter is suspended from export of the specific commodity involved to the EU. If it is a first interception on that commodity and for that exporter, the suspension is temporary, however if is a repeat interception on the same commodity then the exporter is suspended permanently.

The NPPO informed the mission team that since 2009, three exporters have been permanently suspended and a further 19 are in the process of being suspended. The NPPO indicated that in these cases, the suspension is permanent. The two exporters connected with the fraudulent phytosanitary certificates were suspended immediately by the NPPO.

The mission team noted that one phytosanitary certificate had been issued for one of the suspended exporters.

The Plant Protection Wing stated that, following the finding of symptoms of citrus canker in a sample of fruits and subsequent confirmation of infection detailed in the previous section, the exporter involved had been suspended. Following an investigation it was confirmed that the exporter had fraudulently declared that the fruit had originated in Norsinghdi area, whereas it had actually originated in Syhlet. The Plant Protection Wing also stated that no phytosanitary certificates would be issued for exporters whose declaration were found to be false as a result of the follow up...
of EU notifications of interception.

**Conclusions:**

Procedures have been put in place to investigate EU notifications of interception. Corrective action is taken depending on the reasons provided by the exporter for the non-compliance, in line with the principles of ISPM 7. Action has been taken, as noted in section 5.4.3 above to address fraud in phytosanitary certificates, and action has been taken in response to fraudulent declarations provided by exporters.

### 5.5 Wood packaging material and ISPM15 certification

**Legal requirements:**

Point 2 of Annex IV Part A Section I of Directive 2000/29/EC provides conditions for importing wood packaging material from third countries.

ISPM 15 provides guidelines for regulating wood packaging material in international trade.

**Findings:**

The NPPO did not have available a list of establishments authorised to implement the ISPM15. Neither was any documentation available regarding the authorisation and controls.

It was also stated that for the major export commodities, in particular textiles, solid wood packaging material is not used much.

The mission team visited one wood packaging material treatment facility at a plant producing woven polypropylene bags for export to the EU and noted:

- A small gas fired chamber was running more or less on a continuous basis, taking batches of 14 pallets at a time, with two runs per day; air circulation was only provided by a small fan blowing hot air from the gas burner into the top of the chamber;
- The operator stated that for each batch, the chamber temperature is raised to 85°C and normally kept there for 4-5 hours, depending on the estimated moisture content and temperature of the wood to be treated;
- This regime was said to have been established by the NPPO in cooperation with the operator to ensure meeting the ISPM15 requirements; however, no evidence could be provided to the team regarding this calibration and subsequent authorisation;
- The chamber temperature was logged from a sensor on the wall near the top of the chamber. The batch being treated during the visit had been in the chamber for some ten hours, where the temperature had reached 85°C after about 4 hours and then dipped below to around 70°C in periods thereafter;
- The operator took out a pallet and demonstrated to the team a core temperature of the thickest part of the wood by drilling a hole and inserting a regular mercury thermometer;
- The local inspector was not present during the visit of the team, but it was stated that he visits a couple of times a week, checks the computer temperature log and measures the wood core temperature as described above; no records are made of such visits.

**Conclusions:**

The treatment facility visited by the team would most likely be able to meet the minimum heat requirements of the ISPM15 for its pallets by applying the regime demonstrated during the visit. However, in general, the implementation of the ISPM15 in Bangladesh appears mainly driven by exporting companies, needing to meet customer demands without much systematic official
supervision and control.

The risk for the EU posed by this is mitigated by the facts that not much wood packaging material is exported to the EU and that two pests of major concern to the EU, *Anoplophora glabripennis* and *Bursaphelenchus xylophilus* are not known to occur in Bangladesh.

6 OVERALL CONCLUSIONS

There is a clear structure and division of responsibilities in the plant health service in Bangladesh. The organisms of concern to the EU, in particular citrus canker and citrus blackspot are known to occur in Bangladesh and no pest free areas have been established for these.

Action has been taken in response to the continued EU interceptions of harmful organisms on fruit and vegetables exported from Bangladesh, however the lack of traceability and use of exporter declarations, combined with the limited awareness of EU import requirements and harmful organisms of concern, and very limited laboratory and technical support for the NPPO and records of activities, means that the current system of official export checks does not ensure compliance with EU import requirements, and until the shortcomings identified are corrected, there will be a continued risk of introduction of harmful organisms to the EU. This is particularly so for *Xanthomonas axonopodis* and *Guignardia citricarpa*, on *Citrus* fruits.

The system in place for the implementation for the treatment of wood packaging material, as required by ISPM 15, is not subject to official supervision and control.

Recommendations are made in this report to address the shortcomings found.

7 CLOSING MEETING

A closing meeting was held on 10 June 2010 at the headquarters of the Plant Protection Wing in Dhaka, during which the main findings and conclusions of the mission team were presented. The NPPO provisionally accepted the findings and conclusions and indicated a commitment to make any necessary changes.

A second meeting was held at the Department of Agriculture to brief senior management on the main findings and conclusions. The Department of Agriculture expressed a clear commitment to address the shortcomings identified by the mission team and to ensure that plant health is given increased priority in the future.

8 RECOMMENDATIONS

The Competent Authorities in Bangladesh are recommended to:

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<th>No.</th>
<th>Recommendation</th>
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<tr>
<td>1.</td>
<td>Ensure that phytosanitary certificates are issued for regulated plants, only when it has been ascertained that the additional requirements contained in Annex IV, Part A, Section I to Council Directive 2000/29/EC have been fulfilled. This is particularly important for Citrus fruits.</td>
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<td>2.</td>
<td>Ensure that declarations by exporters are not considered to be equivalent to the official</td>
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<td></td>
<td>statements and official control and examination regime for Citrus fruits, required by items 16.2(c) and 16.4(c) or (d) of Annex IV, Part A, Section I to Council Directive 2000/29/EC.</td>
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<td>3.</td>
<td>Ensure that the additional declarations entered onto phytosanitary certificates accurately reflect the official checks that have been carried out, and their outcome, as required by Articles 13a(3) and 13a(4) of Council Directive 2000/29/EC and Section 1.1. of ISPM 12.</td>
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<td>4.</td>
<td>Ensure that the system of official checks at the point of exit is revised to ensure that if a harmful organism is found during the official check, that the remainder of the lot, or if appropriate, consignment, is not considered to be free from the harmful organism, in line with the additional requirements in Annex IV, Part A, Section I of Council Directive 2000/29/EC and the principles of ISPM 5.</td>
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<td>5.</td>
<td>Ensure that the NPPO has access to adequate equipment and facilities to carry out inspection, testing, consignment verification and phytosanitary certification, in particular to enable an efficient and reliable inspection, in line with Section 3.4 of ISPM 7 and Section 1.4 of ISPM 23.</td>
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<td>6.</td>
<td>Ensure that adequate records of official activities related to the export controls are maintained, in line with Section 4.4 of ISPM 7.</td>
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<td>7.</td>
<td>Ensure that officials responsible for performing the export checks have an appropriate level of expertise and technical information in line with Sections 3.1 and 3.3 of ISPM 7. In particular, so that compliance with EU import requirements is ensured.</td>
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<td>8.</td>
<td>Ensure that the facilities authorised to carry out heat treatment of wood packaging material as required by ISPM 15, are subject to systematic official control in line with the same Standard.</td>
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<td>9.</td>
<td>Consider informing the EU of changes made to the system of export controls in particular aimed at minimising the risk of fraud, including the list of suspended exporters.</td>
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The competent authority's response to the recommendations can be found at:


21
<table>
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<tr>
<th>Legal Reference</th>
<th>Official Journal</th>
<th>Title</th>
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<tbody>
<tr>
<td>Dec. 2006/473/EC</td>
<td>OJ L 187, 8.7.2006, p. 35-36</td>
<td>2006/473/EC: Commission Decision of 5 July 2006 recognising certain third countries and certain areas of third countries as being free from Xanthomonas campestris (all strains pathogenic to Citrus), Cercospora angolensis Carv. et Mendes and Guignardia citricarpa Kiely (all strains pathogenic to Citrus)</td>
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