

ANNEX

Response of the Competent Authorities of India to the recommendations of Report ref. DG(SANCO)/2013-6818-MR of an audit carried out from 17 to 26 April 2013 in order to evaluate the system of official controls for the export of plants and plant products to the European Union

N°.	Recommendation	Action Proposed by the Competent Authority
1	<p>Ensure that official checks are performed only by staff authorized by the National Plant Protection Organization, who have the appropriate level of expertise and technical information, in line with section 3 of ISPM 7, and for exports to the EU, Article 2(i) of Council Directive 2000/29/EC</p>	<p>In order to strengthen the current export inspection and certification system, following steps have been taken;</p> <ul style="list-style-type: none"> • The official issuing Phytosanitary Certificate under delegated authority has been withdrawn, and only authorized personnel directed to issue such certificates. • Advisory has been issued to all phytosanitary certificate issuing authorities not to delegate authority to any other official. Any deviation will result in withdrawal of the authorization. • Present system of authorizing the PSC issuing authorities has been reviewed and it has been decided to have minimum qualification as graduate in agriculture with five years' experience in plant protection and special in-house hands-on training on phytosanitary inspection and certification or post-graduate in agriculture with two years experience in plant protection and special in-house hands-on training on phytosanitary inspection and certification. • A dedicated team of officials is being formed to perform pre-shipment inspection for export control in order to meet EU import requirements. A special in-house hands on training on phytosanitary inspection and certification will be imparted to the dedicated team to ensure that they have adequate knowledge of the EU import requirements and are well trained in all aspects of export inspection and certification process, procedures and protocols including sampling of consignments, testing

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		examination of samples as per updated Standard Operating Procedure (SOP), ISPM and the EC Directives.
2	Ensure that for exports to the EU, official statements, including additional declarations for phytosanitary certificates are based on controls or measures performed by appropriately authorized staff, not statements by third parties such as exporters, in line with Article 2(i) of Council Directive 2000/29/EC.	EU specific SOP is being prepared for export certification of consignments. The SOP will also be made available to EU. All PSC issuing authorities will be directed to follow this SOP with regard to EU consignments.
3	Ensure that appropriate checks are carried out of plants and plant products; in particular that the sample size used is in line with the requirements of ISPM 31.	Sampling regime including size etc as per ISPM 31 meeting the requirements of EU will be incorporated in the SOP being developed for export inspection and certification of vegetables and fruits.
4	Ensure that staff performing official checks has access to adequate facilities and a sufficient and safe inspection place to enable a reliable inspection to be carried out, in line with sections 3.4 of ISPM 7 and 1.4 of ISPM 23.	The system of official checks has been reviewed and it has been decided to devise a new system of export inspection and certification at the pack house where adequate facilities for inspection, examination/testing, etc will be available and the produce will be packed under the supervision of plant quarantine official. This system will be put in practice effective 1 st April, 2014. Meanwhile, as an interim arrangement, an exclusive area for inspection and certification work has been established at Mumbai airport from where major export to EU countries takes place to provide safe inspection place for reliable certification.
5	Ensure that staff performing checks are free from interference or pressure from exporters in order to ensure that they have the objectivity and impartiality to perform appropriate checks in line with section 1.4 of ISPM 23	A system is proposed for inspection and certification at recognized/accredited pack houses or at the point of export where export inspection will be carried out in a designated Plant Quarantine area in which entry of unauthorized persons including the exporters shall be

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		restricted. Only the dedicated team shall be entrusted for inspection and certification in line with ISPM-23.
6	Ensure that for exports to the EU, that phytosanitary certificates are issued only when it has been ascertained that the specific requirements specified in Annex IV Part A Section I to Council Directive 2000/29/EC have been complied with, in particular for plants for planting and fruits of Citrus.	A copy of Annex IV Part A Section I to Council Directive 2000/29/EC with regard to plants for planting and fruits of Citrus will be circulated along with the SOP to all phytosanitary certificate issuing authorities for adherence.
7	Ensure that for exports to the EU, that attachment to phytosanitary certificates are used in line with section 1.3 of ISPM 12, in particular that they bear the number of the phytosanitary certificate and are dated, signed and stamped in the same manner as the certificate.	Although, attachments giving details of name of commodities and quantity are normally endorsed by the PSC signing officer at Mumbai, perhaps there have been some instances where this practice was not fully adhered to. However, directions have been issued to all the PSC issuing authorities to strictly adhere to section 1.3 of ISPM-12. Guidance to this effect has also been incorporated in the proposed SOP. It will be mandatory for the dedicated team to comply with EU requirements.
8	Ensure that action is taken to review the effectiveness of the export certification system, in particular in light of the ongoing and increasing interceptions of harmful organisms by the EU, in line with sections 6.1 of ISPM 7 (system review) and 2.6 of ISPM 23.	Highest priority has been accorded for a thorough system review specifically at operational level in order to have appropriate level of confidence which includes performing inspection and certification at pack houses or at point of export by a dedicated team, updating the SOP, compilation of EU import requirements, etc to ensure effective export certification strictly in line with ISPM-7 & 23. System in place will be reviewed periodically to ensure phytosanitary concerns of EU are

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		addressed.
9	Ensure that a procedure is in place, and that investigations are carried out, for performing incident reviews, in particular in light of repeated notifications of interception relating to specific facilities or commodities, in line with Section 6.2 of ISPM 7 (incident review).	NPPO will carry out investigation of cases of non-compliance and take action against those responsible. The provision of investigation will also be incorporated in the SOP. Further, identified problems will be addressed through refresher training of the dedicated team to reduce the interception relating to specific facilities or commodities, in line with ISPM 7.
10	Ensure that a system is in place to allow the traceability of phytosanitary certificates and the related consignments and their parts, in line with section 4 of ISPM 7.	Presently, documentation is made through web based Plant Quarantine Information System (PQIS), so history of the case can be retrieved. In this system a unique registration number is generated for each consignment which is printed on the PSC for that consignment. This unique registration number allows traceability of phytosanitary certificate.