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FINAL REPORT OF AN AUDIT

CARRIED OUT IN

INDIA

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

*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 a footnote.*

## ***Executive Summary***

*This report describes the outcome of an audit carried out by the Food and Veterinary Office (FVO) in India from 17 to 26 April 2013. This was the second audit on this topic and both were undertaken due to the continued interceptions of harmful organisms in consignments of plants exported from India to the European Union (EU), as well as non-compliant wood packaging material (WPM). Since the previous audit in 2010, the number of such interceptions has continued to increase.*

*The objectives of the audit were to evaluate the system of official controls and the certification of plants regulated by Council Directive 2000/29/EC originating in India and exported to the EU and the action taken to address the recommendations of the previous audit on this topic (Ref: DG(SANCO)2010-8707).*

*The audit team found that action has been taken by the National Plant Protection Organisation to address certain shortcomings and recommendations of the previous FVO audit relating to the format and security of the phytosanitary certificates. However, the significant and serious shortcomings in other key aspects of the export controls system, in particular relating to the facilities for performing export inspections, and the conduct of the checks themselves, have not been addressed.*

*It is concluded that, at present, the system of export controls for plant health in India, and, in particular at the main point of exit for fresh produce exported to the EU (Mumbai airport), offers no assurance with regard to the pest status of consignments or compliance with the EU import requirements, or relevant international standards. Unless the significant shortcomings are addressed the risk of introduction of harmful organisms on plant products exported from India to the EU remains high.*

*Recommendations to address the shortcomings identified during the audit are included in the report.*

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## ABBREVIATIONS AND DEFINITIONS USED IN THIS REPORT

<b>Abbreviation</b>	<b>Explanation</b>
APEDA	Agricultural and Processed Food Products Export Development Authority (APEDA) of the Ministry of Commerce and Industry
Consignment	Defined in ISPM 5 as a quantity of plants, plant products and/or other articles being moved from one country to another and covered, when required, by a single phytosanitary certificate
DoA	Department of Agriculture (Regional level)
DPPQ&S	Directorate of Plant Protection, Quarantine and Storage
EU	European Union
EUROPHYT	European Network of Plant Health Information Systems – in this report it refers only to the component constituting the EU’s notification system for interceptions for plant health reasons
FVO	Food and Veterinary Office of the European Commission
Harmful organism	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.
IPPC	International Plant Protection Convention
ISPM	International Standard(s) for Phytosanitary Measures
Lot	Defined in ISPM 5 as a unit of a single commodity, identifiable by its homogeneity of composition, origin, etc., forming part of a consignment
LPQS	Local Plant Quarantine Station
NIPHM	National Institute for Plant Health Management
NPPO	National Plant Protection Organisation
NPQS	National Plant Quarantine Station, New Delhi
NSPM	(Indian) National Standard for Phytosanitary Measure
Plants	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
PQS	Plant Quarantine Service (part of the DPPQ&S)
RPQS	Regional Plant Quarantine Station
SOP	Standard Operating Procedure
Tephritidae	Family of insects commonly called “fruit flies”
Thysanoptera	Order of insect commonly called “thrips”
WPM	Wood packaging material

## 1 INTRODUCTION

The audit took place in India from 17 to 26 April 2013 and was undertaken as part of the Food and Veterinary Office's (FVO) planned audit programme.

The FVO team consisted of two auditors from the FVO and one National Expert from an EU Member State. Representatives of the Agricultural and Processed Food Products Export Development Authority (APEDA) of the Ministry of Commerce and Industry, accompanied the FVO team during the audit.

An opening meeting was held on 17 April 2013 at the headquarters of the Ministry of Agriculture in New Delhi, during which, the objectives and itinerary for the audit were confirmed, and additional information necessary for the conduct of the audit, was requested.

Unless specified otherwise, the data quoted in the following sections and elsewhere in the report, was provided by the National Plant Protection Organisation (NPPO – see section 5.1.1 below).

## 2 OBJECTIVES

The audit was undertaken in response to a continued and increasing number interceptions of harmful organisms in consignments of plant produce exported from India to the EU, and non-compliant wood packaging material (WPM), as detailed in section 4.1 below.

The objectives of the audit were to evaluate:

- The system of official controls and the certification of plants regulated by Council Directive 2000/29/EC originating in India and exported to the European Union (EU).
- The action taken to address the recommendations of the previous FVO audit on this topic (Ref: DG(SANCO)2010-8707).

The following table provides details of the meetings held and sites visited in order to achieve these objectives:

Meetings/visits		No.	Comments
Competent Authorities	Central	3	Directorate of Plant Protection, Quarantine and Storage (Mumbai) Agricultural and Processed Food Products Export Development Authority (New Mumbai)
	Regional	3	National Plant Quarantine Station, Delhi; Regional Plant Quarantine Station (RPQS) Mumbai and Directorate of Horticulture, Pune
	Laboratories	1	National Plant Quarantine Station, New Delhi
Plant health control sites			
Point of exit		1	Air Cargo Complex, Mumbai International Airport
Production sites		1	Ornamental plants, Pune
Exporter Associations		1	Fruit and vegetables exporters (Mumbai)
Treatment facility and pack house		1	Bitter gourd treatment facility (Mumbai)

### **3 LEGAL BASIS**

The audit was carried out under the general mandate of Articles 21 and 27a of Council Directive 2000/29/EC, and with the agreement of the NPPO of India.

#### **3.1 RELEVANT EU LEGISLATION**

Council Directive 2000/29/EC provides for protective measures against the introduction into and spread within the EU of organisms harmful to plants or plant products. These include the requirements that should be met in order for plants for planting and specified plant produce to be imported into the EU.

Legal reference for this Directive is listed in Annex I.

References to EU legislation are to the latest amended version, where applicable.

#### **3.2 INTERNATIONAL STANDARDS**

Article X (4) of the International Plant Protection Convention (IPPC) establishes that contracting parties should take into account, as appropriate, international standards when undertaking activities related to the Convention. The International Standards for Phytosanitary Measures (ISPM) issued by the IPPC thus provide a basis, in addition to the EU import requirements, for evaluating official export controls in contracting parties. India 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 (<https://www.ippc.int>). The ISPMs that were of particular relevance to this audit are listed in Annex II.

### **4 BACKGROUND**

This was the third audit carried out by the FVO to India on plant health issues. The first audit (Ref: DG(SANCO) 2010-8707) took place in February 2010, in order to evaluate the system of official controls and certification of plants and plant produce for export to the European Union and to evaluate the measures taken to meet EU requirements for wood packaging material (hereafter 'previous audit').

The second audit (Ref: DG(SANCO) 2012-6311) took place in January 2012, in order to evaluate the plant health controls in the potato sector in view of India's request to export potatoes from the region of Punjab to the European Union.

The reports of both audits include a detailed description of the control systems and status of harmful organisms in India, which are also relevant to the current audit.

FVO audit reports, together with the comments and action plans submitted by the NPPO, are available on the FVO website: [http://ec.europa.eu/fod/fvo/ir\\_search\\_en.cfm](http://ec.europa.eu/fod/fvo/ir_search_en.cfm)

#### **4.1 NOTIFICATIONS OF INTERCEPTION**

This second audit on the issue of export controls was carried out in response to the continued and increasing number of interceptions of harmful organisms in consignments exported from India, which have been notified by EU Member States. As detailed in table 1 below, EU Member States notified a total of 1,461 interceptions between 1 March 2010 to 31 December 2012 in EUROPHYT, the EU's notification system for plant health. 670 of these interceptions were due to the presence of harmful organisms. The remaining 791 were due mainly to non-compliant or missing phytosanitary certificates.

**Table 1: Summary of notifications of interception by EU Member States in consignments exported from India (source EUROPHYT)**

Reason	2010 (01/03-31/12)	2011	2012
Presence of harmful organism	102	201	367
Other reasons, including documentary reasons.	226	278	287
<b>Total</b>	<b>328</b>	<b>479</b>	<b>654</b>

The data shows that there has been a continuous increase in the number of interceptions of harmful organisms since 2010, when the previous FVO audit on this topic was carried out.

The most commonly intercepted harmful organisms include non-European Tephritidae (“fruit flies”), *Thrips palmi* and other Thysanoptera (thrips), *Lyriomiza* spp. (leaf miners), *Bemisia* spp. (white flies) and *Leucinodes orbonalis* (eggplant fruit borer).

Fruit flies were found mainly on *Mangifera indica* (mango), *Momordica charantia* (bitter gourd) and *Psidium* sp. (guava). Thrips were intercepted mainly in bitter gourd and eggplant; leaf miners on *Ocimum basilicum* and *Trigonella* sp.; and white flies on *Murraya koenigii* (curry leaf).

Further details on the status of harmful organisms of concern to the EU in India are provided in section 5.2 below.

Further information on EUROPHYT and summaries of interceptions, are available on DG SANCO's website: [http://ec.europa.eu/food/plant/plant\\_health\\_biosafety/europhyt/index\\_en.htm](http://ec.europa.eu/food/plant/plant_health_biosafety/europhyt/index_en.htm)

## 4.2 PRODUCTION AND TRADE

### 4.2.1 Production

India has a diverse climate which is very favourable for the production of cereals, fruits, vegetables, cut flowers and pulses. The average size of places of production is 1 hectare or less.

Tables 2 and 3 below provide details of the production of fruit and vegetables of most relevance to the scope of this audit.

**Table 2: Production of vegetables in India 2010 – 2011**

Common name	Botanical name	Area (hectare) and production (tonnes)			
		2010		2011	
		ha	t	ha	t
Bitter gourd	<i>Momordica charantia</i>	26 000	162 000	28 000	168 400
Okra	<i>Abelmoschus esculentus</i>	452 000	4 803 000	498 000	5 784 000
Brinjal (eggplant)	<i>Solanum melongena</i>	590 000	10 165 000	680 000	11 896 000
Onions	<i>Allium cepa</i>	756 000	1 2159 000	1 064 000	15 118 000
Peas	<i>Pisum sp.</i>	159 000	1 465 000	159 000	1 532 000
Chilli	<i>Capsicum sp.</i>	767 000	1 202 000	792	1 223 000

**Table 3: Production of fruits in India 2010 – 2012**

Name	Botanical name	Area planted (hectare) and production (tonnes)					
		2010		2011		2012	
		ha	t	ha	t	ha	t
Mango	<i>Mangifera</i> sp.	709 000	26 217 000	770 000	26 470 000	830 000	29 870 000
Grapes	<i>Vitis</i> sp.	80 000	1 878 000	106 000	881 000	111 000	1 235 000
Pomegranate	<i>Punica granatum</i>	109 000	807 000	125 000	820 000	107 000	743 000
Apple	<i>Malus domestica</i>	274 000	1 985 000	283 000	1 777 000	289 000	2 891 000

#### 4.2.2 Exports

The NPPO informed the FVO team that the EU accounts for more than 54% of total exports of fruits and vegetables from India. The UK is the main destination, followed by the Netherlands, Germany, Belgium, and Italy. Other export markets include the Middle-East, south-east Asia and North America. The export of fruit and vegetables to the EU between 2010 and 2012 is detailed in the following tables:

**Table 4: Exports of fresh vegetables to the EU between 2010 and 2012**

Local common name	Botanical name	Quantity (tonnes)		
		2010	2011	2012
Brinjal	<i>Solanum melongena</i>	4	0	97
Onions	<i>Allium</i>	7 760	7 706	7 665
Peas	<i>Pisum</i> sp.	0	1	425
Chilli	<i>Capsicum</i> sp.	1 437	1 362	2 279
Other fresh vegetables	-	24 062	20 812	26 869

**Table 5: Exports of fresh fruits to the EU between 2010 and 2012**

Local common name	Botanical name	Quantity (tonnes)		
		2010	2011	2012
Mango	<i>Mangifera</i> sp.	3 473	2 995	3 060
Grapes	<i>Vitis</i> sp.	49 359	29 380	28 945
Other fresh fruit		14 100	8 802	8 056

In addition to the data in table 4 above, the RPQS in Mumbai stated that 2 920 consignments of *Momordica charantia*, 363 consignments of okra and 74 consignments of curry leaves were exported to the EU in 2012.

The exports of mango fruits detailed in table 5 above, included 5 586 consignments exported via Mumbai airport.

The NPPO stated that approximately 80% of fruit and vegetable exports to the EU take place via Mumbai International Airport, which was visited by the FVO team (see section 5.4 below).

## 5 FINDINGS AND CONCLUSIONS

### 5.1 ORGANISATIONAL ASPECTS OF PLANT HEALTH CONTROLS

#### Legal requirements

Article 2(1)(i) of 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, are sections 1.3 (responsibility for inspection) and 1.4 (requirements for inspectors).

#### Findings

##### 5.1.1 National Plant Protection Organisation

A detailed description of the NPPO is provided in the previous audit report. The NPPO stated that there have been no significant changes since then. In summary:

- the Directorate of Plant Protection, Quarantine and Storage (DPPQ&S) of the Department of Agriculture and Cooperation, which is part of the Ministry of Agriculture, acts as the NPPO.
- The DPPQ&S is sub-divided into five sections: Integrated Pest Management, Plant Quarantine (PQS), Locust Control, Pesticide Registration and the Quality Control and National Institute for Plant Health Management (NIPHM).
  - The PQS is responsible for the inspection of imported and exported plants and plant products, and for the issue of phytosanitary certificates. There are five Regional Plant Quarantine Stations (RPQS) situated in New Delhi, Mumbai, Amritsar, Kolkata and Chennai, which coordinate the implementation of controls, which is done by 35 Local Plant Quarantine Stations (LPQS).
  - The NIPHM was formed in 2011 from the National Plant Protection Training Section and provides training at national level, including for staff performing plant health checks (see section 5.1.4 below).

The NPPO stated that the Ministry of Agriculture has authorised 153 State offices and research institutions to carry out official inspections and issue phytosanitary certificates. The delegation is by formal Decision of the Minister, and is published in the official gazette and is also available on the NPPO website: [www.plantquarantineindia.nic.in](http://www.plantquarantineindia.nic.in)

These authorised organisations are responsible *inter-alia* for performing checks at place of production (see section 5.4.2 below) and for issuing the phytosanitary certificate (see section 5.5 below) within their geographical area of competence.

During their visit to the Department of Agriculture in Pune, which is one such authorised organisation, the FVO team was informed that the authorised individual had sub-delegated the performance of official checks. The RPQS stated that they were not aware that this had been done. As detailed in section 5.4.2 below, the FVO team found that the officer was not aware of relevant

EU import requirements.

The Agricultural and Processed Food Products Export Development Authority (APEDA) of the Ministry of Commerce and Industry is responsible for the promotion and facilitation of exports of agricultural products. APEDA promotes exports of such products and the implementation of good agricultural practice and quality control schemes. It also provides training programmes and export facilities.

APEDA also operates traceability schemes for specific products, which include the inspection and registration of producers and pack houses. At the time of the audit, schemes covering grapes, pomegranates, peanuts and mangoes (not destined for EU) were in operation. A scheme for more wide ranging traceability of fruit and vegetables – 'Hortinet' is currently under development.

With respect to the current audit, APEDA has a key role in communicating with exporters and also plays a role in the treatment regime for *Momordica* (see section 5.3.2 below).

Further information on the Department of Agriculture and Cooperation, including the DPPQ&S is available on the Department's website: [www.agricoop.nic.in](http://www.agricoop.nic.in)

Further information on APEDA is available on their website: [www.apeda.gov.in](http://www.apeda.gov.in)

### *5.1.2 Legislation*

The NPPO stated that there have been no changes in national legislation since the previous audit. The legal basis for plant health controls is provided by the Destructive Insects and Pests Act of 1914, and the Plant Quarantine Order of 2003.

The NPPO informed the FVO team that a proposal for a new Plant Health Law had at the time of the audit, been presented to Parliament. The proposed new Law is based on bio-security principles, and includes, in its current form, provision for the creation of a bio-security agency, which will have responsibilities for plant health controls.

### *5.1.3 Resources*

The NPPO informed the FVO team that 286 additional posts have been allocated to strengthen the plant health activities. The budget for the posts is included in the current Five Year Plan, which started in April 2012. A recruitment process is planned to take place during 2013 in order to fill the positions. The allocation includes additional staff for PQS headquarters.

The FVO team were informed that there is regular mandatory rotation of management staff, every five years. In addition, management staff are frequently moved on promotion. It was noted that the management staff in the RPQS Mumbai may be present in post for 2 – 3 years.

### *5.1.4 Guidelines and training*

*Recommendation (3) of the previous audit was to ensure that the sampling procedures of the Standard Operating Procedures are followed and the sampling level is increased in line with the ISPM 31 (See also section 5.4.3 below).*

As detailed in the previous report, a Standard Operational Procedure (SOP) for Export Inspection and Phytosanitary Certification has been provided to staff responsible for performing plant health checks. In addition two technical manuals for the identification of Fungi, Bacteria and Viruses, and the identification of Insect Pests have been provided.

The NPPO confirmed that the SOP has not been updated since 2007. The FVO team noted that it

provides detailed information on import and export procedures, including facilities for performing checks and guidance on sampling. The team also noted that the manuals contain guidance for the identification of stored product pests and pests of timber. Neither contains guidance on performing checks of commodities, or detection for specific harmful organisms, of concern to the EU. The NPPO stated that following the previous audit, they had issued instructions to all phytosanitary issuing authorities in April 2010 to 'comply strictly with the guidelines in the SOP for export inspection and phytosanitary certification'. The FVO team noted however during their site visits (see section 5.4.3) that the SOP was still not being observed, in particular the specified level of sampling.

The NPPO informed the FVO team that training is provided to inspectors and other officials, both at NIPHM, Hyderabad and at the work place, to enhance theoretical and practical knowledge on work related to inspections of export consignments bound for all destinations, including EU. The NIPHM has held training programmes for all RPQS staff performing plant health checks. In addition, one course on plant quarantine procedures was held in 2012 for importers and exporters.

Additional training is provided locally by the RPQS for its staff, the main focus of which was the treatment of wood packaging material (WPM), fumigation and stored product pests.

All of the inspectors met by the FVO team stated that they had attended induction training at the NIPHM as well as various internal training and refresher courses. Despite this, the audit team noted major shortcomings in the specific technical expertise of many of the staff met during this audit, in particular in relation to their performance of the export inspections (see section 5.4.2 below).

#### *5.1.5 Laboratories and technical support*

The general structure of the laboratories in India has not changed since the last audit.

Apart from the National Plant Quarantine Station (NPQS), each RPQS has its own laboratory, which performs analysis relating to export checks, including the testing of seeds for planting. In addition each point of exit has a laboratory to enable the initial screening of samples to be carried out.

The FVO team visited the NPQS in New Delhi and met the specialists responsible for performing analysis relating to export checks. It was noted that the laboratory has appropriate equipment for performing a wide range of analysis. The laboratory analyses samples from import and export controls. A total of 5,997 samples from various export commodities had been analysed between 1 January and 30 April 2013, 607 of which were of commodities destined for export to the EU. Two of these samples were of basmati rice, which were confirmed after analysis to be infested with storage pests and as a result were subjected to fumigation and re-examination to ensure pest freedom.

#### *5.1.6 Communication with stakeholders*

The NPPO stated that it has good cooperation with the Customs service and APEDA. The cooperation with Customs is aimed at raising the awareness of plant health issues, in particular WPM used by exporters, in particular those exporting goods of non-plant origin.

The FVO team met with a number of exporters of plant produce to the EU, at APEDA's regional office in Mumbai. The exporters stated that they received a good level of information on plant health issues of concern to the EU from APEDA; all appeared to be familiar with the relevant issues.

### **Conclusions on organisational aspects of plant health controls**

The organisational aspects of plant health controls in India is largely unchanged since the previous audit. There is a plan to recruit more staff to perform checks.

The NPPO has formally delegated the performance of official controls to certain authorised institutions. The tasks, in one case, have been sub-delegated, without authorisation by the NPPO, to staff who were not fully aware of the EU import requirements for the checks that they were performing. The delegation of controls without the authorisation of the NPPO is not in line with section 3 of ISPM 7. For exports to the EU, the performance of checks by staff who are not technically qualified to do so, does not satisfy the requirements of Article 2(i) of Directive 2000/29/EC.

Training has been provided for inspectors, however this has not ensured that staff performing checks of plants and plant produce to the EU are technically qualified, or competent to do so. In particular, the training has not addressed the practical aspects of pre-export inspections, inspection techniques or relevant harmful organisms.

There is regular rotation of management staff within the RPQS, which may undermine the ability to implement any changes or improvements to the system of export controls.

There is adequate laboratory and diagnostic support available for the NPPO.

The SOP for performing import and export checks, including the sampling level, has not been updated since the previous audit. Recommendation (3) of the previous audit has therefore not been addressed; in particular the sampling level specified is not in line with ISPM 31.

## **5.2 PLANT HEALTH STATUS**

### **Legal requirements**

Part A of Annexes I and II to Directive 2000/29/EC lists those harmful organisms whose introduction and movement within the EU is banned. Those of particular relevance to this audit include non-European Tephritidae (“fruit flies”), *Thrips palmi* and other Thysanoptera (thrips).

Annex IV Part A Section I to above Directive details the special requirements for the introduction of plants, plant products and other objects to the EU. These include, in certain cases (for example, herbaceous plants and fruits of *Citrus*) requirements for such material to originate in a pest free area or a pest free place of production.

### **Findings**

The report of the previous audit provides a detailed description of the status of harmful organisms of concern to the EU. The NPPO informed the audit team that there has been no change in the status of these organisms since that time.

No pest free areas have been established for the harmful organisms of concern.

### **Conclusions**

There has been no change in the status in India of the main harmful organisms of concern to the EU.

## **5.3 EXPORT PROCEDURES**

### **Legal requirements**

Annex IV, Part A Section I to Directive 2000/29/EC establishes specific requirements for plants and plants products that must be met in order to be exported to the EU. These may vary depending on the status of the relevant harmful organism in the country of origin.

Annex V, Part B to Directive 2000/29/EC lists the plants, plant products and other objects which must be subject to a plant health inspection in the country of origin or the consignor country, if originating outside the EU and accompanied by a phytosanitary certificate.

ISPM 7 describes the basic elements of the phytosanitary certification process and the requirements for a certification system to fulfil these functions.

## Findings

### 5.3.1 General procedures

*Recommendation (4) from the previous audit was to ensure that the certification of citrus from India to the EU is suspended as long as the relevant special requirements of Directive 2000/29/EC, Annex IV are not fulfilled.*

The general export procedures have not changed since the previous audit. A detailed description is available on the NPPO website. In summary: all plant and plant produce intended for export from India must be accompanied by a phytosanitary certificate. Exporters must submit an application for export, including a copy of the invoice and shipping, or airway, bill. Following a check of the application and submitted documents, a plant health check is carried out, based on a visual examination of the consignment, either at the point of exit, or inland at place of production, or office of an authorised institute. The result of the inspection is recorded, and based on this, the phytosanitary certificate is issued.

The NPPO informed the FVO team that, since the previous audit, an internet based Plant Quarantine Information System has been introduced, enabling the electronic submission of applications for export inspections, as well as the recording of the outcome of inspections and issuance of phytosanitary certificates.

The previous audit report noted that the export of *Momordica*, *Citrus* and *Solanum melongena* to the EU had been suspended by the RPQS Mumbai in response to the ongoing interceptions of harmful organisms on these commodities by EU Member States.

The NPPO stated that the export of *Solanum melongena* and fruits of *Citrus* is not actually prohibited, and that a phytosanitary certificate may be issued on request.

In the case of *Citrus* fruits, no certificates have been issued since there is no interest in such exports.

Exports of *S. melongena* take place regularly, and as detailed in section 4.1 above, are frequently found to be infested with quarantine organisms.

Since the previous audit, an export scheme for *Momordica* has been introduced (see section 5.3.2 below) and exports under this scheme resumed in November 2011.

### 5.3.2 Export scheme for *Momordica*

The NPPO informed the FVO team that an export scheme had been introduced for the export of *Momordica* to the EU. This was initiated by the exporters and APEDA and is intended to ensure that exported gourds are free from *Thrips palmi*. It includes the following steps:

- *Momordica* intended for export should only be sourced from contracted producers who have control measures in place against Thrips;
- The fruits should be subjected to a post harvest treatment at a facility that is registered and approved by the RPQS. The facility must have appropriate equipment to apply the following treatments: continuous immersion for two hours in a solution of 5ppm 'Azadiractin', which is based on a neem extract, followed by hot water treatment for three minutes at a minimum

temperature of 42°C. Sodium hypochlorate should be added to the water. After treatment the fruits should be subjected to a high pressure wash before being dried and packed on site.

- A certificate, confirming treatment should be issued by the facility. This accompanies the consignment.
- Following an inspection of the consignment by the NPPO or Authorised Institution, a phytosanitary certificate is issued for the consignment, either at the facility, or at the point of exit.

At the time of the audit three facilities had been approved for the treatment of *Momordica*; the FVO team visited one, which is operated by Maharashtra State and is situated in the Mumbai area, and met with representatives of the other two, one of which is also situated in Maharashtra State; the other is situated in Gujarat State. According to information provided by the NPPO, the visited facility had accounted for 79 interceptions of *T. palmi* on *Momordica* notified by EU Member States in 2012.

Each of the facilities was required to draw up an SOP for the treatment of *Mormordica* that included the elements detailed above.

At the visited facility, the FVO team met with the RPQS inspector responsible for the supervision of the facility as well as the staff performing the treatments. It was noted that comprehensive records of each treatment are maintained. There is a clear separation between untreated and treated produce and the treatment facility is situated in the basement of the building to reduce the risk of re-infestation by insects entering from outside. Fly screens and insect traps are in place covering entrances to the facility.

The maximum treatment capacity of the facility was 1 tonne/hour.

The facility applied the treatment specified above including immersion in 5ppm Azadirectin. According to the labels on the containers seen by the FVO team, this is an insecticide approved for use on fruit and vegetables against *T. Palmi* and other insects. Its main mode of action is stated to be as a juvenile moulting hormone and anti-feedant. The NPPO informed the FVO team that this insecticide treatment was intended to ensure that any thrips remaining after the treatment would not be viable.

The person responsible for the operation of the facility stated that he was not aware of the numerous interceptions of *T. palmi* notified by EU Member States in 2012. The NPPO confirmed that no action had been taken to investigate the reasons for the apparent failure of the scheme; the assumed cause was cross contamination after treatment.

The FVO team also met with representatives of the other two facilities, who provided information on the operation of their schemes and copies of their SOPs. It was noted that these are in line with the general requirements detailed above.

### 5.3.3 Registration and traceability of consignments

The NPPO stated that there have been no changes since the previous audit with respect to exporters of EU regulated plant produce. In general, producers are not required to register and there are no mandatory requirements to ensure traceability of such produce. The main exception are the products exported under APEDA schemes, including grapes and okra.

## Conclusions on export procedures

The general export procedures are largely unchanged since the previous audit. These are largely in line with EU requirements for plant produce, with the exception of produce for which the EU has

specific requirements relating to the area or place of production, including fruits of *Citrus*.

The introduction of the Quarantine Information System should in theory assist in the management and supervision of consignments intended for export and the recording of official checks and issue of phytosanitary certificates.

The export scheme for *Momordica* should be beneficial, and ensure that fruits exported to the EU are free from harmful organisms of concern. However, fruits exported under the scheme continue to be frequently intercepted by EU Member States. The assurance that such a scheme offers is therefore limited. The reasons for failure of the scheme have not been investigated, which is not in line with ISPM 7, in particular section 6.2. incident review (see also section 5.6 below).

No exports of Citrus have taken place since the previous audit, which is in line with recommendation (4) of the previous audit report. However, the export of Citrus is not actually suspended as previously stated, even though, as detailed in section 5.3. above, the status of harmful organisms of concern, and the export control regime, have not changed, and therefore such fruit would still not comply with the EU import requirements.

## 5.4 EXPORT INSPECTIONS

### Legal requirements

Annexes I and II Part A to Directive 2000/29/EC list those harmful organisms whose introduction and movement within the EU is banned.

Annex V, Part B lists those plants, plant products and other objects that must be subject to a plant health inspection in the country of origin or the consignor country, if originating outside the EU and accompanied by a phytosanitary certificate.

Annex IV, Part A Section I establishes specific requirements for plants and certain plants products, which must be met for export to the EU. In particular, points 16.1, 16.2, 16.3, 16.4, 16.5 and 36.2 lay down provisions for the export fruits of *Citrus* L., *Momordica* L. and *Solanum melongena* L.

ISPM 23 establishes guidelines for inspection. Section 1.4 describes the requirements for inspectors, including access to appropriate inspection facilities, tools and equipment.

ISPM 31 provides methodologies for sampling of consignments.

### Findings

#### 5.4.1 Facilities for performing inspections

*Recommendation (2) from the previous audit was to ensure that all the inspection places are sufficient and safe for an efficient and reliable inspection in line with the Section 3.4 of the ISPM 7 and Section 1.4 of the ISPM 23 :*

The FVO team visited the RPQS inspection facility at the Air Cargo Complex, Mumbai International Airport on two occasions. This point of exit is used for 80% of all exports of plants and plant products to the EU through two separate facilities. Both facilities were visited during the previous audit, when significant shortcomings were identified that were considered to compromise the ability of the RPQS to perform adequate checks.

The RPQS informed the FVO team that there had been no changes since the previous audit.

The FVO team noted during their visits to the main State run facility that the inspections continue to be carried out in the busiest areas of the facility, including the doorways to the loading bay,

weighing station and entrance to the main warehouse. In these areas there is inadequate or no additional lighting. No inspection tables or equipment for performing checks were available at the places where checks are performed. In many cases, the produce was examined on the floor, in these high traffic areas. The FVO team noted, as in the previous audit, that suitable areas for inspection are available, but are not used. It was observed that there is a high pressure and competing demands by exporters on the staff performing checks to have their consignments examined as soon as possible, wherever the consignment was situated at the time that the inspector was available.

The situation in the second facility appeared to be relatively better; checks are performed in the well-lit main warehouse. It was noted that there are no facilities for performing checks, for example inspection tables, and that the staff performing checks were also under high pressure to perform the examination as soon as possible, and wherever the consignment was situated at the time the inspector was available.

The FVO team noted that the equipment for performing an initial examination of any suspected harmful organisms, including a binocular microscope and illuminated magnifying lenses, specified by the SOP is available, however it is not located at the places where the inspections are carried out. Inspectors took a very small sub-sample, usually one item, for examination after completion of the export inspection.

#### *5.4.2 Export inspections*

##### *5.4.2.1 Place of production*

The FVO team met officers from the Department of Agriculture (DoA) regional office in Pune. The Deputy Director of the DoA has been formally delegated to perform official checks and the issuance of phytosanitary certificates on behalf of the NPPO.

The DoA informed the FVO team that while the Deputy Director issues all phytosanitary certificates, he has delegated the performance of the official checks to staff within the Department. The NPPO informed the team that they were not aware of this sub-delegation.

The FVO visited a place of production situated in the Pune area, where export checks are carried out. The place produces herbaceous plants for planting using tissue culture. The plants are exported to the EU as rooted plants. The DoA inspector informed the FVO team that the export checks are based on a check of the seedlings at time of packing for export. The inspector stated that checks are also carried out in the plant production chambers on an occasional basis.

The pre-export check consisted of an examination of a small proportion of each lot. The FVO team noted that the size of the sample was significantly smaller than that specified by the SOP. The inspector appeared to be aware of the main harmful organisms of concern to the EU for such plants, however he was not aware of the specific requirements for the import of such plants to the EU, in particular, the frequency of checks to ensure freedom from non-European *Bemisia tabaci*. The phytosanitary certificates included an additional declaration based on instructions issued by the exporter, that had not been fulfilled (see section 5.5 below).

##### *5.4.2.2 Point of exit*

*Recommendation (3) of the previous audit was to ensure that the sampling procedures of the Standard Operating Procedures are followed and the sampling level is increased in line with the ISPM 31.*

The FVO team observed checks being carried out at two locations within the Air Cargo Centre at Mumbai airport.

The RPQS informed the FVO team that it is established practice that the applications for export are submitted in the morning. These are then checked before the consignment is delivered for export checks in the evening. The latest deadline for delivery is three hours before the scheduled departure time. It was clear during both visits that the majority of consignments were delivered only at or close to this deadline, leading to a high level of congestion in the facilities.

The RPQS informed the team that export checks are allocated to individual inspectors by the RPQS manager, following the earlier check of the hard copy of applications for export against the information provided in their on-line application in the Plant Quarantine Information System. The system does not include the airway bill number for consignments, or the serial number of any phytosanitary certificate that is eventually issued. The FVO team noted that this led to difficulties in identifying the relevant consignments in the facilities, and also made tracing back following an EU interception, difficult or impossible. In addition, in one case examined by the team, it was not possible for the RPQS or for the freight handler operating the facility, to confirm whether the consignment in question, which had been inspected, was present in the facility or had been exported. It was also not possible to locate the shipping documents either, which are identified using the air way bill number.

Although all inspectors met during the visits referred to the SOP and its sampling guidance, it was noted that none of the samples were in line with that guidance. In most cases only one or two boxes were examined from large lots. The boxes were frequently chosen and opened by the exporters.

Exporters met by the team also reported that it was common practice for a consignment, covered by one airway bill, to be the subject of three or more separate applications, which resulted in three or more separate inspections of parts of the same consignment being carried out by separate inspectors. The FVO team was informed by the RPQS inspectors responsible for performing checks that the high number of checks that they were required to perform meant that they did not have time to perform their checks in line with the SOP. In one case observed by the FVO team, the inspector stated that he did not have enough time to perform an adequate check and that a decision would have to be made by his manager, whether the export could proceed based on the preliminary check that he was able to perform. In this case, approval for export was given by the manager. No record was kept of this decision and the planner was not informed that insufficient time had been available to perform the check correctly.

Inspectors had no information available on the pests and diseases of concern to importing countries. The only technical literature shown to the FVO team related to stored product pests and pests of timber, which are not relevant for the EU, or the most likely to be encountered when inspecting perishable plant produce at airport facilities.

The inspectors also did not have information on the requirements of importing countries. In common with the place of production inspections detailed in section 5.4.2.1 above, the certification is based on information provided by exporters. In one case identified by the FVO team, a high level of live *Liriomyza* sp. were identified in a consignment of methi (*Trigonella foenum-graecum*) leaves being exported to a non-EU country. The inspector initially approved the consignment for export, based on the exporter stating that this was not a problem. When pressed, the inspector said that the issue would be referred to his manager for a decision. In the interim the consignment was not removed from the export line – this was only done when the FVO team questioned why it was going through to the loading area. The RPQS did finally confirm that the affected lot would not be permitted to be exported. Despite the FVO team's request for information on the decision making process, or the action taken to ensure that the lot was not exported, none was provided. It was noted that a reference to the finding was entered into the Plant Quarantine Information System, albeit for the wrong consignment, and the phytosanitary certificate was amended to include the statement 'except for methi'.

## **Conclusions on export inspections**

There has been little or no change in the export inspections performed at place of production and point of exit since the previous audit.

An official inspection is carried out for all consignments of plants and plant produce prior to export, which, for the plant products should be in line with EU requirements. In the case of inspections performed at the place of production of plants for planting, the frequency of checks performed was not in line with that required for the import of such plants to the EU and the additional declaration stating compliance with the relevant provisions did not reflect the actual checks performed.

In the case of plant products, there has been no change in the facilities for performing checks or in the conduct of the export checks since the previous audit. The shortcomings noted then are still in place. In particular the facilities at Mumbai, where the majority of exports to the EU take place, cannot be considered to be sufficient and safe, to allow for efficient and reliable inspections to be carried out.

The effectiveness of the checks is further compromised by the lack of time available to perform the checks, linked to the late presentation of consignments for inspection, and the high pressure and competing demands by exporters, which interfere with the ability of staff to perform appropriate checks. The export system in place does not allow traceability of phytosanitary certificates, and the related consignments and their parts, which is not in line with section 4 of ISPM 7.

The SOP does provide some guidance to inspectors, including for the sampling and inspection of consignments. The sampling tables included in the SOP are the same as during the previous audit, and therefore remain lower than the level established in ISPM 31. Despite this, the inspectors do not implement the specified level of checks.

It is concluded that no action has been taken to address recommendations (2) and (3) of the previous audit. The significant shortcomings noted then are still in place, and, as evidenced by the continued high number of interceptions of harmful organisms by EU Member States, the export control system in place does not provide adequate assurance that the EU import requirements have been complied with. Furthermore, the system, at least for the products exported via Mumbai airport, does not provide the necessary confidence to consider the phytosanitary certificates issued there to be reliable documents within the meaning of Article V (2) (a) of the International Plant Protection Convention.

## **5.5 PHYTOSANITARY CERTIFICATES**

### **Legal requirements**

Article 2(1)(i) of 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...'

Paragraph 3 of Article 13a establishes requirements for the phytosanitary certificate, in particular its format, the information it should contain and its issuance. Paragraph (4) of the same Article contains requirements relating to the use of additional declaration on phytosanitary certificates.

Annex IV, Part A Section I establishes specific requirements which must be met in order to export plant and certain plant products to the EU.

ISPM 12 establishes guidelines for phytosanitary certificates.

## **Findings**

*Recommendation (1) of the previous audit was to ensure that information on the phytosanitary import requirements of the EU are available to the inspectors involved in export inspection to ensure that these requirements are satisfied as mentioned in ISPM 7 Section 2 on management responsibilities.*

*Recommendation (5) of the previous audit was to ensure that the use of attachment to the Phytosanitary certificate is in line with the ISPM 12 Section 1.3.*

*Recommendation (6) of the previous audit was to ensure that Phytosanitary certificates are issued to the EU only when it has been ascertained that the specific requirements for the export to the EU have been met (in particular that the additional specific requirements have been identified and the chosen option indicated under “Additional declaration” is in line with ISPM 12, Section 1.1 ).*

*Recommendation (7) of the previous report was to ensure that action is taken to prevent the exporters from circumventing the export certification system in line with ISPM 7, Section 1.*

*Recommendation (8) of the previous audit was to provide guaranties concerning security and confidence of the Phytosanitary certificates in line with ISPM 12, Section 1.4; for instance consider to improve the design of the Phytosanitary certificates to make them more secure against falsification or fraud*

Phytosanitary certificates are issued by the NPPO or, as detailed in section 5.1.1 above, by authorised offices and institutes. According to information obtained from EU Member States, the level of fraudulent certificates has fallen significantly since the previous audit.

The NPPO informed the FVO team, that since the previous audit, the format of the phytosanitary certificate has been revised, in line with the template included in ISPM 12. These new certificates are printed and distributed centrally. The regions no longer locally print their own certificates as was the case at the time of the previous audit. The revised phytosanitary certificate includes a box for the additional declaration, which is now used, instead of the attached sheets as previously. The phytosanitary certificates are completed using the Plant Quarantine Information System.

As noted in section 5.1 above, information on the additional declarations to be included on the phytosanitary certificates is provided by exporters with their application for export. The FVO team noted that the phytosanitary certificates issued by the DoA in Pune for the plants exported from the place of production visited included the additional declarations required by the EU for such plants. However, the DoA inspector did not know what the declaration was stating, and when clarified by the FVO team, confirmed that the frequency of their checks did not comply with item 45.1 of Annex IV Part A Section I to Directive 2000/29/EC.

The same approach was applied by inspectors performing checks at Mumbai airport; information on the importing countries requirements, including the EU was provided by the exporters.

The FVO team noted that the format and use of attachments to the phytosanitary certificate has not changed since the previous audit. The attached sheet is usually a commercial invoice, which is referred to in the box for additional declaration, but is not endorsed by the NPPO and does not include the reference number for the phytosanitary certificate.

## **Conclusions**

The NPPO has taken action to increase the security of their phytosanitary certificates since the previous audit. Recommendations (7) and (8) of that audit have been addressed. However, the staff issuing phytosanitary certificates are still reliant on exporters' information on EU import requirements for completion of the certificate, in particular their statement for inclusion as the

additional declaration. In the case of the DoA, phytosanitary certificates were issued when it had not been ascertained that the EU import requirements had been complied with. In the particular case examined, they had not been compliant. The format and use of attachments for the phytosanitary certificate has not changed; it is not in line with section 1.3 of ISPM 12.

Recommendations (1), (5) and (6) of the previous report cannot therefore be considered to have been addressed. The shortcomings further undermine the confidence that the phytosanitary certificates issued by India are reliable documents within the meaning of Article V (2) (a) of the International Plant Protection Convention.

## **5.6 ACTION TAKEN IN RESPONSE TO NON-COMPLIANCES AND EU NOTIFICATIONS OF INTERCEPTION**

### **Legal requirements**

ISPM 7 describes the basic elements of the phytosanitary certification process and the requirements for a certification system to fulfil these functions. Section 6.1 (System review) requires that the NPPO should periodically review the effectiveness of all aspects of its export certification system and implement changes to the system if required. Section 6.2 (incident review) requires that the NPPO establish procedures for investigating reports from importing countries of non-conforming consignments covered by a phytosanitary certificate.

ISPM 23, Section 2.6 (Review of inspection systems) establishes that NPPOs should conduct periodic reviews of import and export inspection systems to validate the appropriateness of their design and to determine any course of adjustments needed to ensure that they are technically sound.

### **Findings**

#### *5.6.1 Internal interceptions*

The RPQS in Mumbai and New Delhi informed the FVO team that no cases of non-compliance with EU import requirements have been identified at either point of exit. The FVO team noted that the SOP does not include any information on the action to take in the event that a non-compliance is identified.

#### *5.6.2 EU Notifications of interception*

The NPPO stated that there have been no changes to the action taken in response to EU notifications of interceptions since the previous audits. Exporters are advised of interceptions by letter. A batch of advisory letters, all dated 18 March 2013, had been issued to exporters whose consignments had been intercepted due to non-compliant or infested wood packaging material. These included details of the notifications and requested action to ensure that the same problem was not repeated<sup>1</sup>.

The NPQS in New Delhi informed the FVO team that the advisory letters had been copied to them. The RPQS in Mumbai were not aware of any EU interceptions relating to exports from Mumbai, despite the significant number notified by the EU Member States. During the site visits to Mumbai airport, an export agent informed the FVO team that he had been notified by letter, dated 18 March 2013, that his consignment of plant produce had been intercepted in the EU due to the presence of a harmful organism. The FVO team noted that the RPQS was in copy, with a request by the NPPO to investigate and inform them of the reasons for the interception. No action had been taken.

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<sup>1</sup> In their response to the draft report, the NPPO of India noted that: '.....the interceptions received from EU have been further taken up with the concerned exporters, PQ stations, treatment providers etc. The exporters have been advised to ensure that export consignments are free from pests etc. and have been subjected to the treatment, wherever required. The treatment providers have been warned not to repeat such slip-ups in the future and persistent defaulters have had their treatment licenses suspended'.

During the closing meeting, the NPPO confirmed that they had received 79 notifications of interception of *Thrips* spp., intercepted on *Momordica* that had been exported in line with the scheme detailed in section 5.3.2 above. The NPPO confirmed that no action had been taken in response to these.

## **Conclusion**

Exporters are advised of EU notifications of interception, however the NPPO has not taken any action to review the system of export controls, despite the continuing high number of interceptions notified by the EU. There are also no procedures in place to perform incident reviews, including the operation of specific facilities, following specific notifications. This is not in line with the requirements for system or incident review in sections 6.1 and 6.2 of ISPM 7 and neither can it be considered that the NPPO has ensured that the EU import requirements are being complied with. This further undermines confidence in the assurance offered by the system of export controls for plant health.

## **5.7 WOOD PACKAGING MATERIAL AND ISPM 15 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 guideline for regulating wood packaging material in international trade.

### **Findings**

*Recommendation (11) of the previous audit report was that the NPPO considers to have the cold point in the chamber identified during the approval process for heat treatment facilities and required that one of the sensors is always placed in the wood at this point during treatment.*

The NPPO stated that, since the previous audit, the requirements for authorisation of heat treatment facilities had been amended to include a requirement to calibrate kilns in order to identify the cold spot. The relevant national standards "Guidelines for Assessment, Audit and Accreditation of Fumigation Agencies for Undertaking Methyl Bromide Fumigation", NSPM-12 and "Guidelines for Certification of Forced Hot-Air Treatment Facilities for Wood Packaging Material" NSPM-9 have been modified to incorporate this requirement.

The NPPO and RPQS Mumbai also informed the team that training targeted at operators of WPM treatment facilities and exporters had been carried out. It was noted that none of the training had made reference to the frequent interceptions by the EU of *Sinoxylon* spp, on WPM originating in India, and no other steps had been taken to ensure that the trade was aware of the issue.

### **Conclusions**

Action has been taken to identify the cold point in facilities performing heat treatment of WPM. Recommendation (11) of the previous audit has therefore been addressed. However, no action has been taken to address the frequent interceptions of *Sinoxylon* spp. in such material.

## **6 OVERALL CONCLUSIONS**

Certain action has been taken by the National Plant Protection Organisation to address the shortcomings and recommendations of the previous FVO audit relating to the format and security of

the phytosanitary certificates. However the significant and serious shortcomings in other key aspects of the export controls system, in particular relating to the facilities for performing export inspections, and the conduct of the checks themselves, have not been addressed.

It is concluded that, at present, the system of export controls for plant health in India, and in particular at the main point of exit for fresh produce exported to the EU (Mumbai airport), offers no assurance with regard to the pest status of consignments or compliance with the EU import requirements, or relevant international standards. Unless the significant shortcomings are addressed the risk of introduction of harmful organisms on plant products exported from India remains high.

## 7 CLOSING MEETING

A closing meeting was held on 26 April 2013 at the headquarters of the National Plant Protection Organisation (NPPO) in New Delhi, during which, the main findings and conclusions of the FVO team were presented. These were provisionally accepted by the NPPO, although no clear commitment to address the significant shortcomings identified during this, and the previous audit, was provided.

## 8 RECOMMENDATIONS

The National Plant Protection Organisation of India is recommended to:

N°.	Recommendation
1.	Ensure that official checks are performed only by staff authorised by the National Plant Protection Organisation, 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
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 authorised staff, not statements by third parties such as exporters, in line with Article 2(i) of Council Directive 2000/29/EC.
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.
4.	Ensure that staff performing official checks have 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.
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
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

N°.	Recommendation
	plants for planting and fruits of Citrus.
7.	Ensure that for exports to the EU, that attachments 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.
8.	Ensure that action is taken to review the effectiveness of the export certification system, in particular in light of the on-going 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.
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).
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.

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

[http://ec.europa.eu/food/fvo/rep\\_details\\_en.cfm?rep\\_inspection\\_ref=2013-6818](http://ec.europa.eu/food/fvo/rep_details_en.cfm?rep_inspection_ref=2013-6818)

**ANNEX 1 - LEGAL REFERENCES**

<b>Legal Reference</b>	<b>Official Journal</b>	<b>Title</b>
Dir. 2000/29/EC	OJ L 169, 10.7.2000, p. 1-112	Council Directive 2000/29/EC of 8 May 2000 on protective measures against the introduction into the Community of organisms harmful to plants or plant products and against their spread within the Community

**ANNEX II – LIST OF STANDARDS QUOTED IN THE REPORT**

Reference number	Full title
ISPM N°5	International Standards for Phytosanitary Measures N°5, Glossary of phytosanitary terms, Food and Agriculture Organisation
ISPM N°7	International Standards for Phytosanitary Measures N°7, Export certification system, Food and Agriculture Organisation
ISPM N°12	International Standards for Phytosanitary Measures N°12, Guidelines for phytosanitary certificates, Food and Agriculture Organisation
ISPM N°15	International Standards for Phytosanitary Measures N°15, Guidelines for regulating wood packaging material in international trade, Food and Agriculture Organisation
ISPM N°23	International Standards for Phytosanitary Measures N°23, Guidelines for inspection, Food and Agriculture Organisation
ISPM N°31	International Standards for Phytosanitary Measures N°31, Methodologies for sampling of consignments, Food and Agriculture Organisation