Guidelines for inspection
ISPM 23

Göran Kroeker

Kroeker Phytosanitary Consulting
Scope

The standard describes procedure for the inspection of consignments of plants, plant products and other regulated articles at import and export.

It is focused on the determination of compliance with phytosanitary requirements, based on visual examination, documentary checks, and identity and integrity checks.
Outline of requirements

National Plant Protection Organizations (NPPOs) have the responsibility for “the inspection of consignments of plants and plant products moving in international traffic and, where appropriate, the inspection of other regulated articles, particularly with the object of preventing the introduction and/or spread of pests” Article IV.2c of the IPPC, 1997.

The result of inspection should allow an inspector to decide whether to accept, detain or reject the consignment, or whether further analysis is required. NPPOs may determine that the consignments should be sampled during inspection. The sampling methodology used should depend on the specific inspection objectives.
General requirements

Consignments may consist of one or more commodities or lots. In this case the inspection may have to consist of several visual examinations which may include sampling. The standard refers generally to “consignments” but it should be recognized that the guidance provided may apply equally to lots within a consignment.

Note the glossary (ISPM 5) definition of a lot: A number of units of a single commodity, identifiable by its homogeneity of composition, origin etc., forming part of consignment.
Inspection objectives

- Confirm compliance with import or export requirements related to quarantine pest or regulated non-quarantine pests.

- Serves to verify the effectiveness of other phytosanitary measures taken at a previous stage in time.

- May also be carried out generally for the detection of organisms for which the phytosanitary risk has not been determined.

- The collection of samples for laboratory testing or verification of pest identity may be combined with the inspection procedure.
Assumptions involved in the application of inspection

- Inspection of entire consignments is often not feasible, phytosanitary inspections is consequently often based on sampling (ISPM 31).
- The use of inspection as a mean to detect the presence of pests is based on the following assumptions:
  - the pest of concern, or the signs or symptoms they cause, are visually detectable
  - inspection is operationally practical
  - some probability of pests being undetected is recognized
- When inspection is used as a risk management procedure, there is a certain probability that a pest present in a consignment or lot may not be detected.
Responsibility for inspection
NPPOs have the responsibility for inspection, either directly by their own inspectors or inspectors under their authority.

Requirements for inspectors 1
As authorized officers or agents by the NPPO, inspectors should have:
- authority to discharge their duties and accountability for their actions
- technical qualifications and competence, especially in pest detection
- knowledge of, or access to capability in, identification of pests, plants and plant products and other regulated articles
- access to appropriate inspection facilities, tools and equipment
Requirements for inspectors 2

- **written guidelines** (such as regulations, manuals, pest data sheets)
- knowledge of the operation of other regulatory agencies where appropriate
- objectivity and impartiality

The inspector may be required to inspect consignments for:

- **compliance** with specified import or export requirements
- specified regulated pests
- **organisms** for which the phytosanitary risk has not yet been determined
Other considerations for inspection

The decision to use inspection as a phytosanitary measure involves considerations of many factors, including in particular the phytosanitary requirements of the importing country. Other factors may include:

- mitigation measures taken by the exporting country
- whether inspection is the only measure or combined with other measures
- commodity type and intended use
- place/area of production
- Consignment size and configuration
- volume, frequency and timing of shipments
- experience with origin/shipper
- means of conveyance and packaging
More considerations for inspection

- available financial and technical resources (including pest diagnostic capabilities)
- previous handling and processing
- sampling design characteristics necessary to achieve the inspection objectives
- difficulty of pest detection on a specific commodity
- experience and the results of previous inspections
- perishability of the commodity (Article VII.2e)
- effectiveness of the inspection procedure
Inspection in relation to pest risk analysis (PRA)

- PRA provides the basis for technical justification for phytosanitary import requirements
- PRA also provides the means of developing lists of regulated pests requiring phytosanitary measures, and
- identifies those for which inspection is appropriate, and/or identifies commodities that are subject to inspection.

If new pests are reported during inspection, emergency actions may be undertaken. Where emergency measures are taken, a PRA should be used for evaluating these pests and developing recommendations for appropriate further actions when necessary.
Specific Requirements

Inspections involve three distinct procedures that should
be designed to ensure technical correctness while also
considering operational practicality:
- examination of documents associated with a
  consignment
- verification of consignment identity and integrity
- visual examination for pests and other phytosanitary
  requirements – such as freedom from soil.

- Certain aspects of inspection may differ depending on
  the purpose, such as for import/export, or
  verification/risk management purposes.
Examination of documents associated with a consignment 1

Import and export documents are examined to ensure that they are:
- complete, -consistent, -accurate, -valid and not fraudulent
– see section 1.4 of ISPM 12: Guidelines for phytosanitary certificates (PCs)

Examples of documents that may be associated with import and/or export certification:
- PC/re-export PC
- manifest – including bills of lading, invoice
- import permit
- treatment documents/certificates, marks (ISPM 15) or other indicators of treatment
- certificate of origin
Examination of documents associated with a consignment

More examples of documents that may be associated with import and/or export certification:
- field inspection certificates/reports
- producer/packing records
- certification programme documents – e.g. seed potato certification programmes, pest free area documentation
- inspection reports
- commercial invoices
- laboratory reports

Problems encountered with either import or export documents should be investigated first with the parties providing the documents before further action is taken.
Verification of consignment identity and integrity

Inspection for identity and integrity involves checking to ensure that the consignment is accurately described by its documents. The identity check verifies whether the type of plant or plant product or species is in accordance with the PC received or to be issued. This may require physical examination of the consignment to confirm the identity and integrity, including checking for seals, safety conditions and other relevant physical aspects of the shipment that may be of phytosanitary concern. Actions taken based on the result will depend on the extent and nature of the problem encountered.
Visual inspection - pests

For pest detection and for verifying compliance with phytosanitary requirements. Samples are taken from consignments/lots to determine if a pest is present, or if it exceeds a specified level.

The issue of sampling is presented separately:
– ISPM 31 Methodologies for sampling consignments.

If the objective of inspection is the detection of specified regulated pests to meet phytosanitary import requirements, then the sampling should be based on a probability of detecting the pest that satisfies the corresponding phytosanitary requirements.
Compliance of phytosanitary requirements

Inspection can be used to verify the compliance with some phytosanitary requirements, as:
- treatment
- degree of processing
- freedom of contaminants – leaves, soil...
- required growth stage, variety, colour, age, degree of maturity etc.
- absence of unauthorized plants, plant products or other regulated articles
- consignment packaging and shipping requirements
- origin of consignments/lots
- point of entry
The inspection method should be designed either to:
- detect specified regulated pests, or
- to be used for general inspection for organisms for which the phytosanitary risk has not yet been determined.

In the first case the inspector visually examines units in the sample until the target or other pest has been detected or all sample units have been examined. Additional sample units may be examined if the NPPO needs to gather additional information concerning the pest and the commodity. In other cases signs or symptoms are found leading to further samples to be taken.
It is important that:
- examination of the sample been undertaken as soon as reasonably possible after sample has been drawn and that the sample is as representative of the consignment/lot as possible
- techniques are reviewed to take account of experience gained with the technique and of new technical developments
- procedures are put in place to ensure the independence, integrity, traceability and security of samples for each consignment/lot
- results of the inspection are documented

Inspection procedures should be in accordance with the PRA and should be consistently applied.
The result of inspection contributes to the decision to be made:
-if ok, for export a phytosanitary certificate (PC) may be provided; for import the consignment can be released.
-if requirements are not met, further actions can be taken, like:
-for administrative errors by contacting exporting NPPO
-detention, if further information is required
-sorting and reconfiguration – affected products may be removed
-treatment – if an efficacious treatment is available
-destruction – when NPPOs can’t see other solutions
-reshipment
Inspection outcome 2

In some cases a regulated pest is found and there is no doubts. In other cases there is a need for identification or a specialized analysis in a laboratory or by a specialist before a determination can be made. In other cases it may be decided that emergency measures are needed where new or previously unknown pest are found.

It is of the utmost importance that there is a system for properly documentation and maintaining samples and/or specimens to ensure trace-back to the relevant consignment and to facilitate later review of the results if necessary.
Inspection outcome 3

In cases of repeated non-compliance, amongst other actions, the intensity and frequency of inspection for certain consignments may be increased. Even a risk that the importing country imposes a ban on the actual commodities has to be taken into account of. See also ISPM 20 on import regulatory systems, section 5.1.6.

Notifications

When non-compliance, it is for the importing country a duty to quickly inform the exporting country of the problem. This to allow that country to look over their possibilities to take corrective measures, like more intensive inspection or even stop an exporter until corrections are proven to the NPPO.
Review of inspection system

NPPOs should conduct periodic reviews on import and export inspection systems to validate the appropriateness of their design and determine any course of adjustments needed to ensure that they are technically sound. Audits should be conducted in order to review the validity of the inspection systems. An additional inspection may be a component of audit.

Transparency

As part of the inspection process, information concerning inspection procedures for a commodity should be documented and made available on request to parties concerned – in application of the transparency principle – ISPM 1 Principles of plant quarantine as related to international trade.