

Date: 25<sup>th</sup> Feb 2006  
Reference no. NSPM / 1

To  
The Joint Secretary (Plant Protection)  
Dept of Agriculture & Co Operation,  
Ministry Of Agriculture,  
Room No. 147, Krishi Bhavan,  
Rajendra Prasad Road,  
New Delhi 110001, India.

For kind attention of: Shree Ashish Bahuguna

Refer: NSPM 11 and NSPM 12 implementation aspects in India.

Dear Sir,

India is one of the emerging economy of the world and is now poised for the quantum jump as a developed nation. India produced vast amount of agricultural produce which is exported to various countries abroad. India is also a prominent player in various industrial exports. Increasing International trade has also led to the spread of new pests, diseases and weeds. We as fumigators regard it as our task and duty to do utmost to prevent the spread of pests of quarantine risks. We are well aware of our responsibility to comply with quarantine regulations. On the other hand, we also advocate that realistic and clear quarantine regulations are economically very important, enabling both exporters and importers to set up lasting and enduring trade relations. Pest Control Operators have always tried to adhere to the National and International laws and regulations related to the Phytosanitary standards.

Fumigators form a critical component of international trade and fumigators in our country have always tried to help the export trade from India by way of carrying out treatments to various export commodities in Containers and also in ship holds. Besides this, fumigation by methyl bromide is also a useful treatment method used internally in India to keep various stored products pests in check by way of fumigations at Pharmaceutical production plants, various agro processing plants, stored grains in warehouses, etc. Methyl bromide fumigation has also been a useful tool in integrated pest management in various food industries. It has helped curb infestation levels inside production plants when used for incoming material fumigation. This also ultimately leads to getting an infestation free cargo for export purpose.

Fumigators in India have always tried to cooperate with exporters and importers to produce and market material that is fulfilling Phytosanitary standards of Govt. Of India and even beyond. It is also because of this reason that mutual or bilateral programmes have been developed to acknowledge on both sides that Phytosanitary standards are met.

Dte of PPQ and S plays a major role in guidance and control of these activities in India and we commend the efforts of the Directorate to bring our national regulations at par with current international best practices that are followed in the field of Quarantine and Storage. We also congratulate the DPPQS for developing a good website with valuable information for the use of trade. We welcome the New National Standards 11 and 12. We express our intention to follow the methods and practices as prescribed in the Standards.

Therefore we have read both NSPM 11 and 12 in the light of its implementation aspect in relation with some practical difficulties that are faced by fumigators on the field. Some points require clarification for greater understanding of the new standards. Please regard our following comments as a support to your activities to improve the system of safeguarding regulations. We also express our willingness to further cooperate and discuss with you, requirements to improve the standards. We would like to express some observations as mentioned in the attached report for your consideration and seek a hearing to discuss the points mentioned in the report. .

Yours faithfully,  
For Indian Pest Control Association

M. Balagopal  
President

Sunil Surkund  
Chairman, Legal Affairs Committee

CC:

1. Plant Protection Advisor to the Govt. Of India, Dte. Of P. P. Q and S. N.H. IV, Faridabad, Haryana.
2. Joint Director, PQ, DPPQS, Faridabad.

NSPM 11:

1. Country wise quarantine requirements:

On Page 7 : last paragraph : Since the user of the standard are required to “ Consult the Phytosanitary regulations of country to which a commodity is being exported (importing countries)” we request the Dte of PPQS to kindly make the country wise quarantine information available to all fumigators. This will help us all to comply with the rules in a better way. This can be put up by the DPPQS on the website for access to all. We as fumigators do not have access to individual country and their NPPO and we seek the help of DPPQS in this regard.

2. Page 11: point 1.1 Last paragraph:

“Further the use of methyl bromide for the purposes other than quarantine treatments strictly requires the written approval of Plant Protection Adviser and which shall be granted subject to critical use exemptions (CUEs) by the United Nations Environmental Protection Agency. Any such uses of methyl bromide other than quarantine treatments without the permission of Plant protection Adviser is liable to prosecution under the provisions of Insecticides Act, 1962 and amendments issued there under.”

The above sentence should read as :

“ The use of Methyl bromide for other than quarantine treatments is strictly regulated and requires written approval of Plant protection Advisor and which shall be granted subject to the critical inspection and report by the head of the concerned Regional Plant Protection & Quarantine station on application made by the concerned industry whose raw material and production facilities / machinery requires to be fumigated. Any such uses of methyl bromide other than quarantine treatments without the permission of Plant protection Adviser is liable to prosecution under the provisions of Insecticides Act, 1962 and amendments issued there under.”

Non Quarantine Fumigation:

We wish to convey here that the fumigant methyl bromide as mentioned in the Standard has good penetrating ability, rapid action, and is ovicidal in nature. This fumigant is also used to control various stored product pests in Flour Mills, Stored Grain warehouses, fumigation of incoming Raw material of various pharma / agricultural produce and product processing plants which are also used for export products. **Besides this, many food and pharma processing plants fumigate entire production facilities /**

**production machinery once a year to eliminate threat of stored product pests gaining entry into export cargo through processing machinery. Alternate fumigants such as aluminium phosphide can not be used in such places as these production and mill areas contain electronic microchips, various sensors in the machinery which are reactive to phosphine gas.**

We also wish to bring it to your kind notice that export of commodities from India is based upon the quality of products. Indian exporters are required to compete with the products from other countries in aspect of quality and also be competitive in rates. In order to ensure the quality of finished product it is utmost necessary to keep entire processing plant and machinery free of infestation. Also the quality of raw material used in our country w.r.t. infestations is a known fact. In these situations the processor has to use methyl bromide fumigation as the only measure to ensure infestation free criteria. Fumigation with methyl bromide is one of the main treatment today carried out for this purpose. If such usage is not permitted, quality of products shall be affected.

Besides this even the Montreal Protocol allows developing countries like India to use Methyl bromide up to year 2015 for all usage and thereafter only for quarantine and preshipment usage. Even countries such as US, Australia have CUE quotas duly approved and this has been done by the Concerned Govt to help their industry. In absence of such safeguards which are available to our country the trade will be affected, it will become non competitive as the quality of export produce will be in danger of infestation. This is just a question of availing India's rightful concession allowed under the Montreal protocol. Else the decision for not allowing Non QPS fumigation shall put exporters in disadvantage over the other countries which avail the concessions. Even USA has authorised such usages. This action of US EPA is for authorizing 8,081,753 kilograms ie. almost 8081 MTs of methyl bromide for approved critical uses during 2006. We request DPPQS to help us and allow the usage of methyl bromide for selected non quarantine usage such as production machinery fumigation in food and pharmaceutical processing factories to help our economy take advantage of such allowances.

What can be done is as a system DPPQS – PPA can authorise RPQS heads to inspect the premises requiring such usage for non quarantine purpose in their area upon such requests received **from the concerned industry** requiring such fumigation in their premises. RPQS then can depute one of their experts to study such processing plant and machinery and speak to the concerned factory Manager and Engineer in Charge on evaluating and assessing criteria's required for the need to carry out methyl bromide fumigation. On receiving such report by RPQS head, permission may be issued with a due copy to the PPA with the report.

We also request DPPQS for speedy permissions as infestations are sudden. In our opinion pest infestations can take place suddenly and need for fumigation is rapid. Permission for the financial / calendar year is required as the processor can not wait for again all the paperwork to be completed for new permission.

Fumigation procedure: All such non quarantine fumigations shall be carried out as per the NSPM 11 standards.

3. Restricted pesticide licence by States:

Page 11: point 1.2 Last paragraphs: We wish to convey you that many of the Director of Agriculture of various states are not update with the currant regulations and do not issue Form VI C required for storage of restricted pesticide such as methyl bromide and aluminium phosphide. We request the DPPQS to kindly circulate specific notifications to the Director Of Agriculture of all states which can help fumigators to obtains Form VI C and comply with the rules as laid down in the Standard.

4. Approvals for fumigators:

Page 12: point 1.3.1: Since the methyl bromide fumigation activity is to be now carried out inn India only by Registered fumigation agencies, we request the Dte to please issue two separate approvals for use of two fumigants – methyl bromide and aluminium phosphide, at earliest with a copy to our association IPCA so that methods and practices as mentioned in NSPM 11 and12 standards can be followed scrupulously by all new registered fumigation agencies. Two separate lists may also be put on the DPPS website for the benefit of exporters and general users of fumigation treatment.

5. Implementation of new standards in India:

We also request the Dte of PPQS to please write about implementation of NSPM 11 and 12 to various trade bodies and associations of exporters, APEDA, Min of Food processing, Export Promotion council, etc and ask for a strict compliance. In absence of such specific note, fumigators are finding it very hard to explain the exporters about the new procedures and methods of fumigations (covering container – hot gassing – monitoring – ventilation of container before despatch). IPCA is willing to give names of the contact persons and addresses of such organisations so that it will be easy for Dte to post the notifications. A copy of such notification issued by the honourable PPA may be addressed to our association so that it is available to the fumigators for their reference and record.

6. Responsibility of transporters/ container / shipping agencies:

- a. Degassing: We refer to the specifics of degassing on page no. 15, point no. 1.4.4, sub point three: “Ensure not to transport or ship the container without degassing and understand the hazards associated with in-transit treatments.”
- b. We request the DPPQS to add to this clause as to clarify that “The under fumigant / in-transit treatment containers shall be affixed with a appropriate Danger – Skull and bone sign warning label as per the standard of IMDG code. This warning label should be on all four sides of such container and shall help identify hazardous cargo at port of discharge. Responsibility for safety and for ensuring ventilation to acceptable TLV level of fumigant lies with the shipper / exporter / transporter of the consignment.”
- c. **Excise / Custom Sealing of export shipping containers:**

Main hindrance in effective implementation of new standards on Fumigation is that of Excise and customs seal for export containers. Fumigators are not allowed to hot gas and hold back the container as per the standards by Customs and excise officials. Custom officials insist that immediately after loading of shipping containers meant for export be sealed by them immediately when loading is complete. They are not ready to allow exporters holding loaded containers for 24 hrs or for such exposure period and ventilation due to the fear of replacing goods meant for export as per packing list declared by some illegal activity or contraband goods. A proper directive to Customs / Excise dept through the ministry alone can change these circumstances. This important issue and needs immediate attention. **In absence of this directive and compliance by Port authority, Customs, Excise officials – non compliance to fumigation procedure shall continue wherein chances of fumigators drawn in controversy of blacklisting their names in foreign countries may not be ruled out for no fault of theirs. .**

7. Use of 100% methyl bromide: Page 17: Point 2.1.2, page 20: 2.4, 2.4.1, 2.4.2:

- a. Requirement:  
In many situations during the treatment with methyl bromide mixed with chloropicrin, it is observed that the chloropicrin tends to condense and pool on the commodity during the fumigation treatment. This pooling causes great loss of commodity to the exporters. Also chloropicrin is

phytotoxic to live plants, cut flowers, fresh fruits, vegetables & seeds and such chloropicrin mixed methyl bromide can not be used on to number of agriculture produce.

**b. Action:**

To facilitate treatment of commodities which can not be treated due to 2% Chloropicrin component in Methyl bromide, we request DPQS to grant approvals to either import or to manufacture 100% methyl bromide in India. Since this is an extremely toxic substance, access to such 100 % methyl bromide should be restricted to the Accredited fumigators (whose competency has been assessed by the DPPQS) only and not to the non accredited fumigators.

**c. Control:**

Containers / commodity treated with such 100% methyl bromide should not be allowed to travel as in transit treatment and must be ventilated prior to shipping. A certificate of proper degassing shall accompany with consignments treated with 100% methyl bromide. This will help in great extent to carry out treatments to live plants, cut flowers, fresh fruits and vegetables & seeds exported from India.

**d. For this requirement we also request to refer and read from the NSPM 11 following**

- i. Point nos. 2.4 Fumigation of Perishable Commodities,
- ii. Point no. 2.4.1. Nursery stock / bulbs / cut – flowers fumigation &
- iii. Point no. 2.4.2. Fresh fruits / vegetables fumigation

**8. Storage and transport of fumigant: Page 18: point 2.1.3: See Note Box:**

a. “No transfer of methyl bromide from big cylinders to small cylinders shall be permitted outside the manufacturing plant, **except the written approval of the PPA.**” DPPQS should please note that any refilling activity is considered as a manufacturing activity and apart from approval of honourable PPA; it requires Registration from CIB / RC and a manufacturing licence (ML) as well as approvals / licences under Factories Act and Chief Controller of Explosives, Dept of Explosives vide SMPV Rules 1981 and from such competent authorities of the state **under the current applicable laws.**

b. The standard advises that “All Steel cylinders must be subjected to hydraulic test before each filling of the fumigant at manufacturing plant.” Where as the Dept of Explosives - SMPV Rules 1981 states in point 19. **Periodic testing of pressure vessels in service..—** (1) All vessels shall be hydraulically tested by a competent person at a pressure marked on the

vessel at intervals of not more than five years after the date of first test, provided that in the case of vessels, containing corrosive or toxic gases, the periodic test shall be done at an interval of **two years**. These rules already exist and the DPPQS may mention the Rule and Act to be followed, instead of specifics. An amendment by DPPQS shall help clear the matter.

9. Import of Steel Cylinders:

Page 18: Point 2.1.4: Box Note: “Imported Steel Cylinders used for MB require the approval of PPA”. As per existing Gas Cylinder Rules 2004, permission of Customs Commissioner, and Foreign Trade (Development and Regulation) Act, 1992, and Director General of Civil Aviation if imported by air is also required apart from the Chief Controller of Explosives who is the competent authority with regard to the grant / refusal of permissions for import of such cylinders. This creates a conflict with regard to the determination of the competent authority for approval; hence the matter may please be clarified to state that “**Imported Steel Cylinders should be approved by the competent authorities under the applicable laws**”.

10. Expert advice:

Page 18: point 2.2: Standard suggests seeking Expert Advise in case of any doubts on effect of MB on commodities. We request the DPPQS to mention the name and contact details of such competent authority in every region or centrally, which is supposed to be contacted in such cases. This will help in greater interaction with the exporters and fumigators who will be able to plan the treatment in a better way.

11. Packing / shrink wrapping:

Page 19: point 2.3: To allow gas penetration of fumigant gas it is required to cut, remove or open impervious packing:

- a. Need: While it is important to cut, remove or open packing which are impervious, Exporters are reluctant to allow fumigators to do this as it affects their trade and buyers do not accept such commodities. Besides there are various claims on interpretation of “impervious” word. It is requested to DPPQS to lay down certain thickness of packing (say e.g. 30 microns) which are allowed as permeable and beyond which thickness if used, need to be treated separately.
- b. Suggested treatment method for impervious goods: This different treatment can be as follows: Such commodity which shall be packed in impervious packing should be fumigated immediately prior to packing

with methyl bromide as per the NSPM 11 standards. This pre fumigation treatment shall reduce / eliminate the penetration risk associated with impervious packing. Such commodities shall be refumigated in containers as per standard without any cut / slash on the packing.

- c. Control: Two fumigation certificates – before impervious packing in processing factory and after packing in shipping containers shall be attached as a proof and submitted to the DPPQS. In absence of such via media it would be difficult to fumigate such containers and state / certify in the fumigation certificate “The consignment has been verified free of impervious .....” Permeability of different packing material used for export purpose may also be annexed to the NSPM 11 standards. This study can be sourced from competent institutes such as “Indian Institute of Packing”.

#### 12. Temperature sampling:

- a. Page no. 20: 2.4.2.: Fumigators are required to sample temperature from at least one place in each of the bottom, centre and top of the consignment for temperature.
- b. We request to please review this requirement as sampling temp from all the required three spots might not be feasible practically in a loaded container. Request to amend the requirement as “Ambient temperature surrounding the commodity to be treated shall be sampled for this purpose.”

#### 13. Accredited fumigation agency:

- a. Page no. 21: point 2.6.1: standard says that “However fumigation treatments performed by **non accredited fumigation agencies** shall be supervised by a specified officer of Dte PPQS, if treatments are carried out for quarantine purposes or required to be endorsed on Phytosanitary certificate or where the fumigation certificates required to be endorsed.”
- b. We wish to bring it to the notice of DPPQS that “Non Accredited Fumigation Agencies” do not exist as stated in the endorsement of Hon. PPA on page 4 of NSPM 12 which states that “This standard replaces the Manual for Fumigation Operators”. Also non accredited fumigation operators may not be competent enough and may not have required equipment to effectively carry fumigation as required by the Standard.
- c. We request DPPQS to re look at this clause and remove the word “Non accredited” so that all fumigation treatments can be carried out only by competent fumigators assessed / accredited by the DPPQS.

14. Requirement of fumigation enclosure: Page 21: point 2.7: Selection of site:

- a. Covering the enclosure: We understand the importance of fumigating container on a flat and gastight floor. In reality, what happens that often fumigation of export container is called for in a factory premises where export container arrives for loading on the truck trailer. There is no crane available in such places by which shipping container can be lifted and placed on the ground for fumigation under cover.
- b. Ground reality: It is very difficult to comply with the standard in such cases as fumigators shall be required to cover the entire shipping container with the truck / trailer inside the fumigation enclosure. In such situation it may not be possible to create a gas tight enclosure leading to failures. Also we do not know the effect of methyl bromide fumigant on the various motor machine parts used in the truck assembly – lubrication oils, seals, tyres, rubber parts, sponge cushion seat, brake seals etc. As these parts shall also be subjected to fumigation treatment along with shipping container destined for export. We may not know the ill effects which might lead to some fatal accidents.
- c. Suggestion: Hence, we request you to review the clause of covering the container with fumigation cover in only such cases where factory stuffing is carried out by the exporters.
- d. Control: Containers mounted on truck can be tried to make gastight as best as possible by using silicon sealants on leaky areas, floor gaps etc and shall be monitored continuously with a gap of 6 hours and shall be topped with fumigant intermittently if necessary.
- e. Suggestion Confirms to the standard: Refer option 3 for fumigations greater than 12 hours mentioned in point no. 2.19.9. On page no. 40 of NSPM 11. We look forward to the Dte to help exporters and fumigators by advising correctly on this aspect.

15. Authentic source for temperature estimation:

Page 22: point 2.8: We wish to convey the DPPQS that the authentic source for estimating temperature in various regions is available and this data can be sourced on the internet at following link of IMD: <http://weather.nic.in/forecast.htm>. This can be incorporated in the Standard so that fumigators can access this data for treatments carried out overnight.

16. Fumigation covers: Page 24, point 2.10.1:

- a. While we use 200 GSM or more than 200 GSM thickness fumigation covers, it is not possible for the manufacturers to get a test certificate stating the permeability criterion of 0.02 gm / sq. mt. / day for methyl bromide.
- b. Our members of the association are keen to follow this standard laid down by the DPPQS and request you to please let us know the Institute which can carry out this permeability test. This will help all the members to comply with the standard.

17. Laying down gas sampling lines: Page no. 28: point 2.12.2 :

- a. Standard says “Where practical and possible there should be at least three sampling lines within the fumigation enclosure; one line in each at the front base (**mandatory**), at the top back and in the centre of the commodity being fumigated.” Does this mean that “if not practical and feasible “only one sampling line would be sufficient for monitoring purpose? And that sampling line at front base is *mandatory* and other two are *Optional*?” Require more clarity on this issue.
- b. Refer to the note in the box “**Note**: - For multiple containers being fumigated in one stack, under the same sheets, each container must be treated as a separate enclosure – i.e. three sampling lines should be used for each container.” We request you to please review this and include clause stating that “In the event if more than three containers are being fumigated under same sheet, each container may have one sampling line to be placed at top centre in each container”.

18. Volume calculation:

Page 29: Formulae for calculating volume of Conical structure and Semicircular structure is same (i.e.  $1.6 \times R^2 \times H$ ). This if it is an error may be rectified.

- a. For conical structures it should be  $\frac{1}{3} \pi R^2 \times H$ . i.e.  $\frac{1}{3} \times 3.2 \times R^2 \times H$  which may be expressed as  $3.2 / 3 \times R^2 \times H = \mathbf{1.06 \times R^2 \times H}$
- b. For Semicircular Structures it should be  $1.6 \times R^2 \times H$  and what is indicated in the standard is correct.

19. Methyl bromide Poisoning:

Page no. 33, Refer methyl bromide poisoning, emergency aid and medical treatment : Knowing that fumigators deal with hazardous gas, DPPQS should make it mandatory on part of fumigators to display the signs and symptoms of methyl bromide poisoning on a board of size 2 ft length x 2 ft wide with bold

readable letters in regional and English language. This display should be in the room of operators who carry out fumigation.

20. Blood Test:

Page no. 34: point no. 2.14.6: It is important to undergo a regular blood test and physical examination of Accredited Fumigation operators and other co workers as laid down in the standards. While **there is no interval mentioned in the standard at which these tests are to be carried out.** We suggest that routine blood test and physical examination **be carried out once a year.** We trust that the DPPQS will consider this suggestion.

21. Application of correct quantity of fumigant:

Page 34: point no. 2.15: It is utmost necessary to ensure that correct quantity of methyl bromide is introduced in the fumigation enclosure. We request you to please amend this clause from “platform scale” to include a word “digital display platform weighing scale”. This will bring more clarity on type of weighing scale to be used.

22. Distribution of gas within fumigation enclosure:

Page no. 35 please refer to point no. 2.17, last sentence “Where high velocity and high volume fans are used they must not run for longer than 15 minutes....” We request to DPPQS to please bring more clarity in this sentence by amending the same as “Where fans with velocity higher than 70 cubic per minute are used they must not run for longer than 15 minutes.....”

23. Measuring and monitoring gas concentrations:

a. Tabular format Option 2 : Page 37: Point no. 2.19.1:

We wish to invite your attention to the option 2 of **Less than 12 hrs – “Initial and endpoint monitoring - with top up option at the end”** has been suggested for fumigations less than 12 hr exposure period. This is exactly opposite and contradicts with the note in the box mentioned on page 39 in point 2.19.7 which reads as “**Note: - For fumigations less than 12 hours in duration top-up is not an option.**” We request more clarity on this issue from the Dte.

b. Pressure testing and correct dosage application: Page 37: point no. 2.19.2:

Many of our exporters are preparing to construct an atmospheric chamber to perform fumigation of Wooden Packaging Material. We require a clarification on “Whether monitoring is required in such chambers which have tested positive for pressure test as per the standards laid down by DPPQS?” (Please also refer to AQIS Part B – point no. 5.5.2.1 on this.). We recommend including a requirement

of fan to be installed inside such atmospheric chambers for better circulation of fumigant. This can be included in point 2.9.1 on page 23.

24. Fumigation of ship holds:

Page 41: point no. 2.22:

The DPPQS has made it mandatory for fumigation of ship holds to be carried out “ **Under the strict supervision of Plant Quarantine Officers who have considerable experience in undertaking ship fumigations.**” Our association would like to state here that the DPPQS and its officers have always been the regulatory authority for all fumigations. But we may mention here that **all such fumigation of ship holds till date has always been carried out by the approved private fumigators in the country.** Therefore the insistence of carrying out fumigation in ship holds “ under the strict supervision of Plant Quarantine Officer” is not warranted considering the experience of the approved fumigators in carrying out such fumigations for the last 50 years. However, our association does agree with the methodology to be followed by fumigation operators as given in point no. 2.2.1 to 2.2.11.

Our association also suggests that the DPQS, through their authorised officers should inspect the ship holds fumigated by the approved fumigators on their request and issue the Gas Free Test Certificate.

Further considering the time and efforts required for such fumigations which is generally carried out at short notice and also the time involved in carrying out such fumigations, it would not be practically possible for the DPPQS to depute specific officers who have considerable experience specifically in undertaking ship holds fumigations to supervise these jobs from start to end which normally extend beyond normal office hours.

25. We also request the Dte of PPQS to kindly arrange to notify to all port authorities and also ICD's / CFS's about such change in the fumigations rules and regulations and to make available isolated space and infrastructure required for such activities. A programme at any of the seaport to explain and train the industry fumigators in new methods of Ship Hold Fumigation can be arranged.

26. Appendix VI NSPM 11 – Fumigation Certificate:

As discussed already in point no. 11 above, we request the DPPQS to please omit the line “*This is to certify that the goods described below were treated in accordance with the fumigation treatment requirements of importing country (\_\_\_\_\_) and declared that the consignment has been verified free of impervious surfaces/layers such as plastic wrapping or laminated plastic films, lacquered or painted surfaces, aluminium foil, tarred or waxed paper etc. that may adversely effect the penetration of the fumigant, prior to fumigation.*”

- a. We suggest including following to replace the current sentence:

*“This is to certify that the goods described below were treated in accordance with the details of treatment as mentioned below”.*

- b. Since the responsibility of ensuring impervious packing is of the manufacturer / exporter / shipper / producer of commodity intended for export, the declaration in this regards should be taken in writing from them and not from the fumigators who do not have any control on determining the packaging. If necessary proper action for creating awareness on this aspect should be initiated through the appropriate authorities of Min of Food Processing and other relevant departments. Indian Institute of Packaging who has considerable expertise in this field and as a competent authority may be roped in for this exercise.
- c. We also again request the Dte to kindly put the regulations of various countries on the web site for easy access to the Fumigators and Exporters. At best links to the official websites of different countries may be made available on the website of DPPQS with a link to IPPC site – relevant page where addresses of various country heads of PPQ dept are available.
- d. Many of the shippers / exporters prefer fumigation of Wooden Packaging Material (WPM) under cover which saves them the cost and they can fumigate sufficient qty of WPM at one time under cover which will last them for three to four shipments. Fumigators affix ISPM mark assigned to them by DPPQS, after such under cover fumigation of WPM destined for export purpose. Since fumigators do not know the exact destination at the time of treatment, they can not write destination port / country while issuing certificate of fumigation. Accounting for such fumigation in monthly report to be submitted to the DPPQS is a problem currently as to in which column (import / export) these types of fumigations are to be accounted is not clear. More clarity on this aspect is requested from the DPPQS.
- e. Should fumigators now continue to affix 21 days validity stamp on all methyl bromide fumigation certificates as was done before? Since fumigation is termed as a Curative treatment and not Preventive, 21 days validity has to be re looked into.
- f. Fumigation certificate Appendix VI: We request the Dte to include a column to mention the Destination of export cargo. This is a requirement of shippers / exporters.

NSPM 12:

27. Aluminium phosphide fumigations:

As per the endorsement on page 4, the existing guidelines are to regulate the Methyl bromide Fumigation in our country. We also wish to bring it to the kind attention of the Dte the fact that Aluminium Phosphide is also used in large proportion for fumigation of various commodities internally and for export purpose for such commodities where methyl bromide is forbidden to be used. Since the earlier manual for fumigation operator has been replaced, fumigators and exporters / domestic customers are in a dilemma on usage of aluminium Phosphide. Fumigators are also worried that if this remains unregulated, questions on safety and proper usage might come up.

- a. In view of this, we request the Dte to kindly clarify, whether earlier branch approvals / licences and Expertise approvals to carry and supervise fumigations are still valid for Aluminium Phosphide fumigations?
- b. If yes, should fumigators continue to report quarterly usage of this fumigant to the Dte as was done earlier or should it be discontinued?

28. Jurisdiction: The new Guidelines for Assessment, Audit and Accreditation of Fumigation Agencies do not specify the operational jurisdiction of the registered fumigation agency. Many fumigators are taking advantage of the same and are issuing fumigation certificates / ISPM mark in several other states which is practically not feasible and gives way for malpractices. This needs to be rectified immediately and as before state wise jurisdiction of operations be notified.

29. Single / Multiple registrations: If the DPPQS is of other view on the aspect of jurisdiction can a fumigator operate nationally on single registration (with many accredited fumigation operators placed locally)? This requires immediate attention.

30. Submission of reports: Page No. 5: Fumigators are required to submit copies of reports on usage of fumigants to DPPQS + NPPO + Local RPQS / PPO office. With the DPPQS now expanding its operations and opening new offices, we require guidance on the jurisdiction of such RPQS / PPO offices so that we can send copies to relevant authorities and comply with the requirement.

31. Non QPS purpose fumigation:

A procedure for application of permission of the Hon. PPA needs to be established for getting approvals for usage of methyl bromide other than pre shipment and quarantine purposes on case to case basis. We look for the guidance from DPPQS on this aspect. This will also help establish CUEs as per Montreal Protocol.

32. Transfers of Accredited fumigation operators:

In case of large fumigation organisations, transfers of Accredited Fumigation Operators from one Registered Branch to another registered branch might happen in future and hence we request the Dte to take this in to account and establish a protocol – procedure in which for such cases Accreditation Cards can be re issued with change in address within same fumigation company.

33. Training Requirements:

Page 10: Point no. 2.1.1: We would request the Dte to please let us know the competent organisation which can be contacted for training of our new personnel in fumigation. We also urge the Dte to conduct the Training courses themselves as Other organisations such as CFTRI are not equipped for effective training due to lack of expertise in new methods and procedures as established by the DPPQS. IPCA / PCI will be pleased to extend a helping hand and organise such training.

34. Certificate of Registration:

Page No. 12: point no. 2.3: Revalidation of Accreditation Certificate is to be carried out every year after initial three year validity expires. This will cause considerable time and we request the DPPQS to please look in to this aspect again and revalidate such Accreditation Certificates at an interval of every three years instead of current provision.

35. Reporting of fumigation activity:

Page no. 15: point no. 2.8: Earlier quarterly reporting system was very good and reduces administrative burden on our operational staff. We request DPPQS to kindly reconsider the period of report submission and restore it to earlier Quarterly interval. ∞