

Date: 11 August 2006

To,
The Plant Protection Advisor
to the Govt. Of India
Dte. of Plant Protection, Quarantine and Storage
National Highway IV,
Faridabad, Haryana

For kind Attn of: Dr. P.S. Chandurkar – PPA

Sub: NSPM 11 and NSPM 12 implementation aspects in India and Fumigation certificate format.

Reference:

1. Meeting dated 05.05.06 at Dte. with Shri. Ravi Prakash, Shri. O.R. Reddy, Dr. S.C.Bansal and Mr. DDK Sharma.
2. Our Representation submitted by IPCA to JS (PP) with a copy to PPA and JD (PQ) dated 25th Feb 06

Dear Sir,

As per our discussions we have discussed various points noted during the meeting referred as above within our association members. In this context we wish to submit following points for the consideration of the Dte of PPQS while revising the National Standard on Phytosanitary Measures 11 on Methyl bromide fumigation procedure.

1. Fumigation Certificate format: We have discussed and debated this issue within our association members wish to suggest a new format as indicated in Annexure I. The new format is very similar to AFAS certificate for fumigation and we suggest that same format be used for other fumigations in the country as well – i.e. also for Methyl bromide fumigation for other countries in general and also for all phosphine fumigations. This will reduce burden on treatment providers to a great extent as currently we have to maintain different certificate formats for all three fumigation treatments –

- a. Fumigation for Australia – as per AFAS format
- b. Fumigation by MeBr to other countries – as per NSPM 11 format
- c. Fumigation by Alu Phosphide – as per previous Fumigation Operators Manual.

We request the DPPQS to kindly consider this request and make the new format for fumigation certificate mandatory for all fumigations done in the country.

2. We note that the DPPQS website has now has a link to IPPC and this gives access to addresses of Quarantine depts of Different countries. This shall come in as a reference if any fumigator in India requires any clarifications regarding treatment schedules of importing countries.
3. Restricted pesticide licence by states:

Page 11, point 1.2 last paragraph: Form VI C is required for storage of restricted pesticides such as fumigants. Request to issue a specific notification to the Director Agriculture of all states which can help fumigators obtain Form VI C and comply with the rules as laid down in the standard. This notification may please be copied to IPCA so that we can circulate it amongst our members.

4. Implementation of new standard in India: In order to facilitate the easy implementation of the NSPM 11 Standard, it is utmost necessary to spread information of contents of the standard amongst all those statutory bodies and associations involved in Export / Imports. As per our discussions we request DPPQS to send the new requirements to be followed for fumigation procedure to following trade bodies, associations, govt. depts. These organisations can further disseminate your letter to their members for implementation.

- a. APEDA,
- b. Export Promotion Council,
- c. SOPA
- d. IOPEA
- e. Rice Exporters Association
- f. Spice Board
- g. Custom Commissioners
- h. Chamber of Commerce and Industry
- i. EXIM bank
- j. Min of Food Processing
- k. All Port Authorities
- l. Shipping Lines
- m. Shipping Agents
- n. Custom House Agent Association
- o. Clearing and Forwarding Agents Association
- p. Transporters associations
- q. Etc.

We shall submit the addresses of above and other trade bodies / associations in a separate communication to you. IPCA is willing to cooperate in this venture and if a common letter is sent to us, we can help despatch the same to various organisations.

5. Degassing: Please refer to page no. 15, NSPM 11, point no. 1.4.4, sub point 3: We enclose a fumigation guidance document from GAFTA (Grain and feed Trade Association) for your reference, on page no. 9 of this document it is mentioned in point 7.3 following: (Attached as Annexure II)

"Frequently containers are fumigated but not ventilated prior to loading and these containers are therefore fumigated intransit, as the ventilation process will not take place until after they have been discharged from the ship. The carriage of containers intransit under fumigation is covered by the IMDG Code whereby these containers are classified in Section 3.2 Dangerous Goods List as "FUMIGATED UNIT Class 9 UN 3359". Also refer to the IMDG Code Supplement Section 3.5.1 and 3.5.2 of chapter called "SAFE USE OF PESTICIDES IN SHIPS".

Accordingly, we request the DPPQS to allow intransit fumigation of containers shipped to such countries where it is allowed and fumigator has clearly stated so in the fumigation certificate and also has taken proper safety measures such as affixing Danger Signage Stickers to make aware other people of hazards associated with it.

6. We also request you to please revise the contents of the NSPM 11 manual in line with the AQIS revised part B format which is more reader friendly with informative and Mandatory sections. Our association shall again submit the representation to the DPPQS with more thoughts and suggestions. We thank you the DPPQS in assisting the fumigators and taking proactive approach through organising training etc which are more helpful operationally to enhance the overall quality of work done on the ground.

With best regards

Yours faithfully
For Indian Pest Control Association

Sunil Surkund
Chairman Legal Affairs Committee