

Date: 25th Feb 2006
Reference no. NSPM /

To
The Plant Protection Advisor,
to the Govt. of India,
Directorate of PPQS,
NH – IV, Faridabad.
Harayana.

For kind attention of: Dr. P. S. Chandurkar

Refer: NSPM 11 and NSPM 12 renewals of Registrations granted to fumigators in India.

Dear Sir,

We wish to bring it to the kind attention of the directorate that in 2005 the directorate had successfully commenced accreditation of all fumigators in India under one common standards of fumigation that is NSPM 12. The process of Assessment had received momentum starting July 05 to Nov 05, we have majority of fumigation registrations carried out by the DPPQS. The three year period is getting over by next year in 08 and starting from July 08 to Nov 08 , the DPPQS will have a task of re-assessment of all those Fumigators across entire India.

This re-assessment will be with additional task of accreditation of individual expertise to carry out fumigation as per NSPM 11 guidelines. to be renewed. DPPQS will have to carry out similar exercise through the regional plant quarantine stations of visiting the fumigators and carry out planned re-assessments, process their applications, assign the task to regional PQ Officers, get mutually acceptable dates, travel to site, remain there for at least two days, have practical demo done with written and oral examination and also check fumigation equipment of the fumigators. This we know and understand is mammoth work. We also understand that the Directorate already is burdened with much of the workload in many areas of work and also routine daily work in RPQS has to be maintained to facilitate the exports / imports.

We will have to carry out careful planning of this exercise and through our Association we Through our association we shall be educating our member fumigators and are asking them to submit applications for renewals minimum three months in advance, before expiry of the current registration. Utmost care shall be taken to coordinate with Directorate and also with Regional Plant Quarantine Station authorities to complete the documentation and actual re-assessment before the due date of expiry of individual registration certificates.

However we have to always anticipate delays due to any unforeseen circumstances and take in to account possibility of re-assessment remaining pending and not being completed before the expiry of registration certificate of the fumigator. In such case our member fumigators shall face a real problem and their business will get affected and they shall not be able to carry out fumigation after the expiry of current fumigation registration certificates. If this has

to happen with majority of fumigators, the export and import trade of the country will get affected and problems will be complicated. India will loose foreign exchange earnings and the confusion will create panic amongst exporters and importers.

In order to avoid this situation our association requests the Directorate that a planned approach should be taken w.r.t. The re-assessments and they should be completed before the expiry of current registration certificate. To be more on safer side we also request the honourable PPA that a general letter on extension of validity of current registrations may be issued until further re-assessment is carried out. This extension to all fumigators will help much and give a breather to plan for he exercise with a more practical approach taking in to consideration availability of regional plant quarantine officers for the task.

We humbly request one again to consider this at earliest and help all fumigators. We shall assure the directorate on behalf of our fumigator members that due planning and submission of renewals for re-assessment will be ensured.

Thanking you,

Yours faithfully,
For Indian Pest Control Association

Sunil Surkund / M. Balagopal.
Chairman, Legal Affairs Committee

CC:

1. Joint Secretary – Plant Quarantine, Dept. of Agriculture & Cooperation, Krishi Bhavan.
2. Joint Director, PQ, DPPQS, Faridabad.
3. RPOS Stations.
4. Fumigator Members of IPCA.