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Reference No: IPCA / xxxx/ 08-09

To

The Plant Protection Advisor,
to the Govt. of India,
Directorate of PPQS,
NH -IV, Faridabad - 121001.
Harayana.

For the kind Attn of: Shri P S Chandurkar – PPA

Subject: NSPM 12: Certificate of Registration for Fumigation Operators – Renewal / Re-Validation of Registration of Fumigation Agencies.

Dear Sir,

We refer to the guidelines issued in Feb 2005 by the Directorate under NSPM 12 and NSPM 11 in order to regulate fumigation operations in India. Under these guidelines, Directorate had issued Registrations for fumigators under the new rules and regulations of Accreditation scheme. Directorate has established a central register of fumigation agencies with accredited fumigation operators wherein accredited fumigation operators were allocated a unique registration number and each accredited fumigation operator was assigned a unique accreditation number. The registration of fumigation agency was granted for an initial period of three years and thereafter it is to be revalidated every year upon application from the Registered Fumigation Agency one month prior to expiry of registration certificate. This process of Registration of Accredited fumigation Agencies commenced in May 2005 and till date the Directorate has 249 fumigators on its central register with more than 325 accredited experts. Out of the above, 116 Agency registrations were granted in July to Dec 05 alone with more than 125 accredited experts assessed at an average of 14 to 26 per month. The process of assessment had received momentum commencing July 05 to Nov 05 during which we have majority of fumigation registrations carried out by the DPPQS. These registrations are due for renewal again w.e.f. July 08 onwards in the order of their expiry. The DPPQS has a task of re-assessment of all those Fumigators across entire India.

These renewals of registrations / accreditations will be with additional task of accreditation of individual expertise to carry out fumigation as per NSPM 11 guidelines. 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 the various sites, remain there for at least two days, have practical demonstrations done with written and oral examination and also check fumigation equipment of the fumigators. This we know and understand is massive work. We also understand that the Directorate is already burdened with much of the workload in many areas of quarantine and also routine daily work within RPQS has to be maintained to facilitate the exports / imports. 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.

We would like to bring it to the kind notice of the directorate and for their consideration the fact that it would be physically impossible to carry out assessment and inspection audits for revalidation of registrations / accreditations all over India as regulation of fumigation operations is just one of the several responsibilities of the directorate. The delay that may happen in assessments and audits for revalidation because of circumstances beyond control and ground realities will result in a large number of Pest Control Operators being automatically out of the business and their names being struck off from the Central Register of the Directorate and also from the list published on the website of DPPQS.

The other repercussion apart from loss of business and reputation of the Pest Control Operator would also affect the trade of the country due to inability of PCOs to service the export-import trade for the above stated reasons.

Sir, the Directorate is already empowered and is carrying out inspection based audits on regular basis to check compliance of the Pest Control Operators to the NSPM 11 and NSPM 12 standards. Directorate is further empowered to suspend or revoke the registrations / accreditations granted based on non conformities noticed in the audits / non compliance to the standard guidelines as issued by DPPQS. Hence renewal / revalidation of Registration / accreditations should not be linked to the inspection audits as PCOs are already subjected to the conditions as laid down in the NSPM 11 and NSPM 12. Therefore, we request the directorate to consider renewals on the receipt of the applications for renewals from registered / accredited fumigators in the normal course without precondition of inspection audits.

We further request that as such registrations / accreditations are basically an approval of the technical capability, knowledge and competency and is not a licence to carry out business, there need not be a term for the approvals and such approvals should remain valid until they are revoked / suspended by the directorate OR surrendered by the PCO / accredited fumigation operator upon their discontinuance in the business.

These measures will help the Pest Control Service Industry to carry out activities without any fear of being suddenly put out of business due to circumstances beyond their control and therefore provide better, prompt and effective service to the export-import trade of the nation.

We request the directorate that members of our association are always available for consultations on the issues and we shall cooperate with the directorate to observe compliance to the standard guidelines. Sir, We humbly request once again to consider this at earliest and help all fumigators. We assure the directorate on behalf of our fumigator members that due planning and submission of renewals within time will be ensured. Thanking you,

Yours faithfully,
For Indian Pest Control Association

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