

# What has changed?

## IVA Standard



### Background

The IVA independent service delivery role is critical to the successful implementation of the Regulatory Model and subsequent credibility of the MPI Plants Export certification system.

The significance of the need for IVA independence (of industry organisations) and a consistent interpretation and application of the standards have been reiterated during the current standards review.

The current review has focused on ensuring there is transparency and clarity between the IVA and the Organisation requirements, roles and responsibilities but at the same time ensuring the approach is consistent but not over restrictive.

### What have we changed?

To ensure the IVA standard stays relevant and addresses the critical roles and responsibilities IVAs undertake on behalf of MPI the main areas of change include:

- Providing greater flexibility on which ISO standards (17020, 17065) they choose to become accredited to.
- Greater clarity on what services they are providing to MPI and the contractual arrangements that these services operate under.
- Clarification of the basic documented operating procedures IVAs need to have to accurately describe how they undertake these phytosanitary activities on behalf of MPI.
- Clarifying the differences between the services they provide to MPI and what is required to deliver these versus the inputs MAO's provide.

- Better alignment of some technical requirements between the IVA and the Organisation Standards.
- A new requirement for the IVA role in trace-back investigations.
- A rewrite of both the 'Application for authorisation as an IVA' and the 'Contract for authorisation of an IVA' to align it with the revised MPI certification standards.
- Details relating to the following clauses have been moved from the standard into the contract of authorisation;
  - Suspension and termination of IVA authorisation.
  - Confidentiality.
  - Assignment and sub-contracting.

### How will this impact IVAs?

This new approach should result in:

- Improved clarity on how IVAs fit into the broader context of the MPI Plants export certification system.
- Clarity on how the IVAs MPI services may align or integrate with some of their other non-regulatory compliance programmes.
- A closer alignment and agreed approach with MPI when the standards are rolled out.
- A clear focus on which requirements the IVAs need to have documented operating procedures for.
- More consistency between and within IVA's.
- The IVA resigning their contract of authorisation with MPI.

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### Detailed description of changes to the IVA Standard

Change		Why?	Impact on existing systems
All	Reformatted into a 'MPI standards' template.	Consistency of format will provide greater clarity for industry longer term.	No significant impact although changes to sequencing and numbering may mean IVA's may need to adjust their documentation to suit.
All	Re-ordered the sections.	More sequential as to how IVAs looks at the approval process.	
Part (P) Intro	A concise overview of who this Standard applies to and why it is important to understand the requirements.	Provides a simplified introduction to the requirements contained in the standard.	No significant impact. The introduction indicates the standards general effect.
P 1	Now focuses on IVA gaining authorisation. The retention of authorisation has been moved to a new section	Moved the ongoing retention of authorisation to better reflect how it works in practice and save confusion for the IVA's.	Less ambiguity on what is needed to 'gain' authorisation and what is needed to 'retain' authorisation. No impact on how IVA's document their system.
P 1.1	Greater flexibility in the selection of the ISO standard IVAs are certified against	Recognition that ISO17020 isn't necessarily the only standard that fits with IVA's. ISO 17065 possibly fits better for audit bodies.	May mean no change but enables IVA's to choose an ISO certification that fits better with their overall service delivery needs.
P 1.2	New section on R&R's that links through to the Framework standard.	Need to ensure IVA's are clear on their roles and responsibilities and how this impacts their selection of MPI service delivery options.	No significant impact. Will provide better clarity of IVA roles and responsibilities.
P 1.3	Revised (expanded) list of 'services' IVAs can provide and includes the specific link to the applicable technical requirement standards.	Provide clarity for IVA's on what they can and can't deliver and also provide clarity on what requirements they need to address for each service delivery option.	No significant impact if the IVA's have correctly identified, considered and documented their system to suit the list of service delivery options.
P 1.4	Minor changes to the wording in the IVA authorisation pathway.	Reflect changes to options for ISO accreditation and changes of names.	Limited impact
Deleted	Moved 'amendments to authorised system' into a new section (Part 3)	Better reflects how the authorisation process works in practice.	No impact
P 1.5	New section on requests for dispensation and equivalency.	Consistent with clause in Organisation standard. IVA's can also make requests for dispensations or equivalency.	Provides opportunity for new or novel approaches by the IVA to be accepted by MPI.
P 2	Bulleted what needs to be included in IVA system, clarifying where procedures are required or not.	Have reduced the complexity and need for IVA's to document procedures to meet MPI requirements (may still need to address certain aspects to gain ISO accreditation).	The IVA may choose to remove some of the procedures that are included in their IVA system.
P 2.1	New section on IVA system overview	Clarity of what should be included in the system overview – contact details etc. Consistent with Organisation standard.	IVAs likely to already capture the bits of information but this consolidates these requirements.
P 2.2-2.5	Documented procedures no longer needed for management review, document control & internal audit. Confidentiality clauses moved to the contract.	Recognised that the requirement to document a procedure didn't necessarily add value. IVA's still need to demonstrate key outcomes have been achieved for these areas. Confidentiality clauses are better located in the contract.	IVA may decide to withdraw these documented procedures from their IVA system. Note: Most ISO standards still require documented procedures for these aspects.
P 2.5	Renamed to 'service delivery procedures'. MPI pre-approved procedures added.	The IVA service delivery procedures are more consistent with the Organisation Standard approach. Provide clarity on the use of MPI pre-approved procedures.	The approach to procedural documentation is consistent with the ISO approach so should not have a significant impact if the IVA procedures are well written.

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P 2.6	New section from Organisation standard on maintaining phytosanitary security	IVA's perform similar tasks to Organisations (e.g. inspections) and the IVA also needs to ensure that product that has gained a certification status retains that status through to the point of export.	May require IVA's to develop more robust procedures to address their responsibilities after they have assigned a certification status and how these interface with MAO's.
P 2.7	More descriptive on staff competency and conduct of IVA staff.	Introduced consistency with Organisations on expectations around staff conduct and managing conflicts of interest. The actual competency requirements for staff have been relocated into the appropriate service delivery option (Technical standard)	The competency requirements have remained relatively consistent. More detail may be required by IVA's regards their management of staff conduct and conflicts of interest.
P 2.8	New section on the IVA role in trace-backs and investigations	To make it clearer to IVA's around MPI's expectation of the IVA when conducting trace-backs and investigations.	To provide clarity to staff, IVA's may decide to document procedures for the completion of trace-backs and investigations.
P 2.9-2.10	Changes to presentation of these sections and some of the specific content	Reviewed the content of records and reporting to clarify what MPI needs to maintain an oversight of the integrity of the certification system.	Minor changes to the records/reports IVA's need to maintain and their content.
Deleted	Moved details on sub-contracting to the contract (App 2).	MPI expectation around IVA subcontractors remains the same but located in a more appropriate location.	Simplified the standard and removed the need to provide explanation in the IVA system.
P 2.11	More focus on communications between IVA's when organisations are transferred	Ensuring where transfers occur, IVA's approach it fairly and consistently and ensure that any compliance issues are properly dealt with.	Minimal. Minor adjustments in the IVA approach to transfers of Organisations.
P 3	Section split off from 'gaining authorisation' to focus on amendments to IVA system	So the IVA standard follows a logical step wise progression and that 'gaining' versus 'retaining' authorisation isn't confused.	Minimal as the criteria has largely stayed the same.
P 4	New section split off from 'Gaining authorisation' which focuses specifically on non-compliance, suspension & termination	Clarification of the management (stepwise approach) of critical non compliances found by accreditation body/MPI or by the IVA themselves. Clarification on the approach taken when IVA's are suspended re-instated or their authorisation is terminated.	Minimal impact.
P 4.1	Moved detail of suspension & termination to the contract.	The detail relates to the contractual arrangement between the IVA and MPI.	Simplified the standard and removed the need to provide explanation in the IVA system.
P4.3	New section on management of critical non-compliance findings	Clearly defined process when critical non compliances found by either MPI/ Accreditation body or internally by the IVA.	Minimal impact as just providing clarity around expectations of the various parties.
P 5	Verification of certificates service retained in this standard.	It is a service that only IVA can deliver so is less confusing for MAO's about who is able to verify certificate requests.	No impact.
P 5.1-5.2	Redefined the steps when verifying certificates and details staff competency requirements.	To reduce confusion around who needs to do what. Clarity of the competency requirements.	The IVA may need to review the content of their procedures to align to the requirements
App 1	Updated application to reflect changes to the standards	Clarity of names, service delivery options.	No impact

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App 2	Updated contract and capturing more of the detail in the contract.	Suspension and termination, confidentiality and sub-contracting are best dealt with in the contract rather than the standard.	The IVA may be able to remove some detail from their system that is now addressed in the contract. The IVA will need to re-sign.
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