

Desired outcome

To reduce the risk of Psa-V transfer through fruit, people and equipment movements during kiwifruit harvest and packing by ensuring postharvest operators are compliant with KVH protocols and their own documented Psa-V Risk Management Plan.

Background

During harvest and packing activities, movements of people, vehicles, equipment and fruit that could be contaminated with kiwifruit leaf and plant material with the potential to carry Psa-V increase significantly. Postharvest operators and processors recognise this and play a key role in managing the risk of Psa-V spread associated with their operations.

Packhouses are required to provide their Psa-V Risk Management Plan, which outline their harvesting and packing operations, for approval and sign off by KVH prior to the commencement of harvest each year. Refer [KVH Psa-V Risk Management Plan Requirements](#).

Audits reviewing compliance to the approved plans may highlight breaches or non-compliances. In some cases these breaches may be significant and pose a risk of Psa-V transfer to orchards or regions where Psa-V has not been detected.

Scope

KVH have established minimum requirements for packhouses to ensure any risk of transferring Psa-V infected material is minimised. These requirements are outlined in the [KVH Protocol: Harvest Packing and Reject Fruit](#). KVH, or its appointed representatives, will audit packhouses to measure compliance against these requirements.

Under the NPMP KVH has the legal authority to take action when non-compliance is identified.

Audits

KVH, or KVH appointed auditors, will complete site audits to ensure compliance to KVH protocols and packhouse documented Psa-V Risk Management Plans.

Site audits shall cover all areas outlined in the [KVH Psa-V Risk Management Plan Requirements](#).

For all related requirements refer also to [KVH Protocol: Fruit Bins](#); [KVH Protocol: Harvest, Packing and Reject Fruit](#); [KVH Best Practice: Orchard Hygiene](#).

Early season audits will focus on movements to, and within, Exclusion and Containment regions to reduce potential risk to these areas. Additional audits may then be scheduled as a result of perceived risk and/or regional status.

Audit Plan

All packhouse sites will commence the 2014 season on Low Risk. Status may move during the season dependent on audit results as detailed below. Packhouses will begin each season on the same status as they ended the previous season. Risk status will be site specific.

Low Risk

At least one audit will be completed annually during each harvest/packing season at no charge.

High Risk

Identification of one critical non-compliance (or an accumulation of three major non-compliances) in one season will immediately move a packhouse status to High risk. A minimum of three chargeable audits will be required to change status back to Low risk.

At the end of each packing season audit results and packhouse performance will be summarised and reported.

Audit charges

Audit costs for the base audit plan will be met by KVH, unless audits are completed as a result of non-compliance.

Where non-compliance leads to follow up audits, Packhouse operators will be charged:

- \$100 (excluding GST) per hour for each additional audit.
- Travelling time and mileage for each additional audit.

Non-Compliance Categories

To ensure consistency in the approach used throughout the industry, the non-compliance categories and corrective actions have been aligned with those detailed in the Zespri Quality Manual.

Critical –those incidents which place orchards or regions at risk of exposure to Psa-V infection due to movement or hygiene controls not being followed.

Major – an incident resulting in lack of confidence in the packhouse system operating effectively. e.g process operating not complying with packhouse DQS.

Minor –an incident which does not add risk of Psa-V or affect the efficacy of the operator’s system. e.g. inadequate records.

Corrective Actions

Where non-compliance has been identified, the corrective actions shall be discussed between KVH and the postharvest operator and action will be agreed and documented.

Depending on the severity of the non-compliance, on-going inspections (of bins, equipment and/or systems) may be required until corrective action has been completed.

Once corrective action has been completed and verified there may be extra audits scheduled (at packhouse cost) until KVH confidence in operating systems has been regained.

The following table outlines potential non-compliance, category of breaches and types of corrective actions that may be required.

KVH Psa-V Risk Management Plan Non-Compliance

Compliance area	Non-compliance	Classification	Corrective action required by Post Harvest	KVH Action
Harvest hygiene	Documented hygiene protocols are not being followed.	Critical if relating to movement controls, otherwise major.	Ensure protocols are followed. Initiate internal audit to confirm.	Consider risk and take action as required. Follow up audits at charge.
	Failure to communicate hygiene requirements to contractors.	Major	Ensure requirements are communicated. Initiate internal audit to confirm.	Consider risk and take action as required.
Harvest Bins	Failure to sanitise bins.	Critical	Processes to be reviewed to ensure bins are sanitised prior to movement.	Increased auditing at charge to confirm processes operating satisfactorily.
	Failure to identify or segregate regional bins.	Critical if bins sourced from Recovery or Containment and going to Containment or Exclusion region.	Identify and segregate bins as per plan.	Consider risk, review future of closed loop bins into the region from this post-harvest operator and take action as required.
	Failure to segregate sanitised bins from other bins.	Major	Segregate as per plan.	Increased auditing at charge
	Empty bins not sanitised when moved between orchards.	Major	Processes to be reviewed to ensure bins are sanitised prior to movement.	Increased auditing at charge
	Plant material found in bins at audit by KVH.	Critical if in a Containment or Exclusion region, otherwise major.	Take required action for contaminated bins. Undertake necessary activities to ensure bin cleaning and inspection is effective.	Agree action for contaminated bins. Consider risk, review future of closed loop bins into the region from this post-harvest operator. Increased auditing at charge.
	Plant material found in bins on orchard inspection.	Critical if in a Containment or Exclusion region, otherwise major.	Undertake necessary activities to ensure bin cleaning is effective and bins are being inspected on orchard.	Increased auditing at charge
Transport and Containment	Transport requirements not met for covering load.	Critical if relating to movement controls, otherwise major.	Ensure processes are understood and followed by transport providers used.	Consider risk and take action as required.
	Vehicles or equipment leaving packhouse not cleared of plant material or not sanitised.	Critical if relating to movement controls, otherwise major.	Ensure processes understood and followed by transport providers used.	Consider risk and take action as required.
	KVH not notified of movements where required.	Critical if relating to movement controls, otherwise major.	Retraining of staff in requirements. Internal audit to confirm.	Risks considered and if relating to bins, non-compliant bins to be audited at charge.
	Waste material not disposed of appropriately.	Critical if in a Containment or Exclusion region, otherwise major.	Review processes and ensure adherence to requirements.	Establish risk .Increased auditing at charge.

Compliance area	Non-compliance	Classification	Corrective action required by Post Harvest	KVH Action
Transport and Containment (cont.)	Reject fruit disposal requirements not met.	Major (Critical if disposal in an Exclusion region from Containment or Recovery)	Review processes and ensure adherence to requirements.	Establish risk .Increased auditing at charge.
	Requirements for supplying fruit to kiwifruit processors not met.	Critical if fruit required to be sanitised hasn't been sanitised, otherwise major.	Review processes and ensure adherence to requirements.	Establish risk .Increased auditing at charge.
Records and documentation	Orchard Psa-V status records not maintained.	Major	Records to be updated.	Follow-up audit at charge to ensure compliance.
	Internal audits incomplete.	Major	Records to be updated.	Increased auditing at charge.
	Facility documented processes for Psa-V Risk Management as signed off by KVH not adhered to.	Major -minor if related to record keeping.	Update written procedures or implement corrective action to ensure documented processes are followed.	Establish risk. Increased auditing at charge.
	Corrective action not taken where indicated.	Major	Implement corrective action immediately.	Establish risk .Increased auditing at charge.
	Records missing or incomplete.	Minor	Records to be updated.	Establish risk. Increased auditing at charge.



NON – COMPLIANCE FORM

Auditor: _____

Date: _____

Post-harvest Facility: _____

Requirement non-compliance relates to :

Protocol reference:

Non-Compliance category :	Critical	Major	Minor
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Risk Status:	LOW	HIGH
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Agreed Corrective action:

To be completed by: (date)			
Signed (KVH):		Signed (post-harvest representative):	

Charges to be applied: \$ (excluding GST)

Signed off By KVH		Signed off (post-harvest representative):		Date:	
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Copy of this completed form to be left with the post-harvest operator