

Harmonization Plans

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What is a harmonization plan?

A tool used by regulatory agencies to provide consistent, uniform pest risk mitigation methods to:

- Establish a framework that encourages states to consistently and appropriately characterize pest risk and infestation status based on current scientific and field information;
- Pursue uniform adoption and implementation of pest risk mitigation measures to reduce pest risk to a level acceptable to receiving states.

What is a harmonization plan?

- Generally involves growing practices, inspections, and/or treatment protocols, to meet a less stringent pest freedom standard than a formal quarantine.
- It is not a federal quarantine, does not override individual state regulations, and will not preclude a quarantine, regulation, or regulatory action taken by a state

What isn't a harmonization plan?

- A one size fits all approach
- An easy fix or magic bullet
- Appropriate for all pests and all situations

Examples of harmonization plans

- National Plant Board Japanese Beetle Harmonization Plan
- State National Seed Potato Harmonization Plan
- Light Brown Apple Moth harmonization Plan

NPB Japanese Beetle Harmonization Plan

- Originally established in 1998
- Revised in 2004 & 2016
- Purpose is to protect uninfested states, while providing shippers consistent, easy to understand certification requirements
- Requirements pertain to regulated articles not covered under existing federal JB quarantine.
- 10 states maintain individual quarantines

State Nat'l Seed Potato Harmonization Plan

- Began as an initiative of National Potato Council in early 2000s
 - Concerns were raised that seed potato certification programs were state run and had different rules and regulations
- Purpose – to facilitate U.S. international negotiations on market access for potatoes by
 - Developing a minimum set of pest management and certification standards
 - Establishing a state commitment to those standards and establishing federal oversight over the implementation of the MOU

Light Brown Apple Moth Harmonization Plan

- Developed in 2012
- Used the JBHP as a template
- Concern at time was continued reductions to LBAM funding could jeopardize federal funding
- An alternative regulatory approach may be needed to continue to provide protection to states and industry
- Never put into place

Common components

- Voluntary programs – states can choose to accept the harmonization requirements or develop different requirements, including quarantines or regulations, or take no action.
- Set minimum standards to provide continuity of requirements for shippers and regulatory staff.
- Only as good as the enforcement efforts of the states

Questions to consider in developing future harmonization plans

- Is regulation through a harmonization plan appropriate for the pest or pathway?
- Are more effective or appropriate tools available?
- Are mitigation steps available to reduce risk to acceptable levels and are they enforceable?
- What would the mechanism be for the development of the plan, periodic reviews?

Summary

Harmonization Plans are:

- Are a regulatory tool to provide a consistent framework for regulators and industry
- Voluntary
- Don't replace or override other regulations or quarantines
- Need regular review