Restructuring Postentry Quarantine (PEQ)

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Imports, Regulations, and Manuals
Plants for Planting Policy
USDA-APHIS
How do plants enter the US?

- Permit is required for all import categories if for propagation
- Plants are inspected at Plant Inspection Station for all import categories
- Phytosanitary Certificate is required for all except Controlled Import Permits

**Generally admissible plants**

Example: *Petunia*

**Restricted or NAPPRA plants**

**Special Foreign Inspection and Certification**
7 CFR 319 Subpart-Plants for Planting
- Testing
Example: *Pelargonium* (geranium)

**Postentry Quarantine**
7 CFR 319.37-23
- Quarantine
Example: *Humulus*

**Controlled Import Permits**
7 CFR 319.6
- Containment
Example: NAPPRA taxa
“Not Authorized Pending Pest Risk Analysis” NAPPRA (7 CFR 319.37-4)

Plants become NAPPRA because:
- They are known to be host of a significant plant pest
- They themselves could become invasive

Countries are given exemption based on:
- Pest not being present
- History of significant trade with no pest findings

Regulatory process: Federal Register notice-based process

Example of NAPPRA listing:
Malus: Host of Anoplophora chinensis
Prohibited from all countries except Belgium, Canada, France, Germany, Netherlands
What happens under PEQ?

1. Growers apply for permit (PPQ 546)
2. SPRO inspects the site
3. SPRO determines the quantity
4. APHIS issues permit
5. Quarantine
6. SPRO final inspection
7. SPHD > PEQ coordinator releases from quarantine
Significant challenges with PEQ

1. Large import volumes do not allow effective inspection for pest and disease
2. Pest list is not updated based on a PRA (last update 1980)
3. Plant health determination is based on visual inspection (no testing)
4. Problems with tracking/reporting
PEQ Internal Review Summary

Move taxa to NAPPRA based on import history

- Prioritize top ten taxa for PRA (pest risk analysis)
- Limit amounts of plants entering PEQ
- Develop a better tracking system
- Evaluate State’s abilities to conduct inspection
- Evaluate policy for Canada and PEQ

Engage NCPN, More CIP

Develop offshore certification

Align PEQ with ISPM34

Update:
- pest/pathogen list
- Fix inconsistencies in CFR, PEQ manual and job aid

Provide justifications for PEQ taxa
- why exemptions to a country
- why certifications for a country but not others
- quarantine time period

Engage NCPN, More CIP
### Our roadmap

**Phase 1**

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<tr>
<th># PEQ taxa</th>
<th>94 (40 NAPPRA)</th>
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**Intent: Developmental**

- ✓ Allow importation with a Controlled Import Permit (PPQ 588 permit)

**Zero - Medium imports (<5000 plants)**

- 71 (26 NAPPRA)
Phase 2

**High volume imports**

23 (14 NAPPRA)

**Intent: Commercial**

- Establish a Commodity Import Process
- Request/update PRAs
- Formalize offshore production operations
What will be the outcome of PEQ Restructure?

- All PEQ taxa will be NAPPRA, country exemptions given based on trade & pest status

- Zero-medium volume imports
  - Entry authorized with a CIP (containment/quarantine period/testing)

- Large volume imports
  - Evaluate based on PRA
  - Identify mitigations
  - Develop offshore production programs
  - Quarantine in the US may not be required
Where are we now?

- Plants will continue to enter under PEQ until restructure is complete
- **PRA in development for high import volume taxa:**
  - In process: Acer, Eucalyptus, Hydrangea, Rosa, Malus, Chrysanthemum
  - In queue: Annona, Syringae, Olea, Vaccinium, Durio, Dianthus, Prunus, Punica
- **NAPPRA datasheets:**
  - 40 requested, 9 completed, 10 in review
- **CIP conditions formalized:**
  - standard conditions are established for several
  - quarantine conditions are to be established for each taxa

**Outreach:**
- NPB members meetings (working group AZ, ME, OR, MD, OR, SC, WA)
- Industry interaction (AmericanHort, Cultivate 18…)
Feedback and concerns

Industry:
- CIP process:
  - unclear of what the requirements are
  - issuance of permit may require a long time
  - may not fit the requirement for field growth for evaluation

SPROs:
- State revenues from inspection was considered not significant
- Relief from inspection will help the State to allocate their resources elsewhere
- CIPs may limit oversight
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Controlled Import Permit Process to import NAPPRA Taxa

The CIP process can be completed in < 3 months if containment facility is ready

- NAPPRA/Prohibited taxa
- PPQ 588 Permit application
- Containment check
- Identify conditions for quarantine, tests before release
- State review process, applicant acceptance, and Issue Permit