

# 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

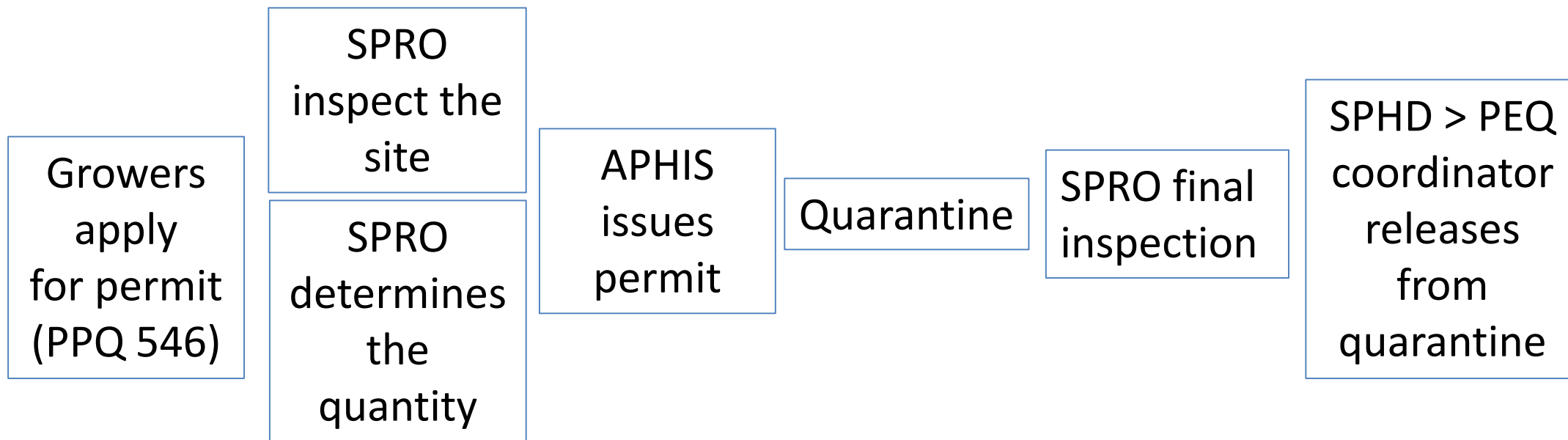
Example of NAPPRA listing:

*Malus*: Host of *Anoplophora chinensis*

Prohibited from all countries except Belgium, Canada, France, Germany, Netherlands



# What happens under PEQ ?



# 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)**

**Engage NCPN, More CIP**

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

**Limit amounts of plants entering PEQ**

**Evaluate State's abilities to conduct inspection**

**Develop offshore certification**

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

**Develop a better tracking system**

**Evaluate policy for Canada and PEQ**

**Align PEQ with ISPM34**



# Our roadmap

## Phase 1

# PEQ taxa
94 (40 NAPPRA)

Zero - Medium imports (<5000 plants)
71 (26 NAPPRA)

**Intent: Developmental**

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



## 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



# Contact information

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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

