The PPQ Recall Process

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Background

On occasion, non-compliant products make it past the port of entry and enter U.S. commerce.

These prohibited or non-compliant products may be discovered during inspection surveys and trade compliance activities.

Once prohibited or non-compliant products are found in commerce, it may be necessary to recall such products if they pose a tangible risk to U.S. agriculture.
What is a Recall?

• The **voluntary** removal of a non-compliant product from commerce, and the subsequent destruction or re-export of the product under PPQ supervision

• Generally, product is recalled from wholesale/retail level only, not from individual consumers
Why is a Product Recalled?

We confirmed the product is non-compliant with our regulations (prohibited, restricted, found with live pests, diseases or noxious weeds, or contaminated with soil), considered to be a significant agricultural risk, and has been widely distributed in commerce.
## Who is Involved with a Recall?

<table>
<thead>
<tr>
<th>Major Players</th>
<th>Others</th>
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<tbody>
<tr>
<td>PPQ – any program but often SITC</td>
<td>Distributors, wholesalers</td>
</tr>
<tr>
<td>PPQ Recall Coordinator</td>
<td>Individual commerce sites</td>
</tr>
<tr>
<td>Importer</td>
<td>Transport companies</td>
</tr>
<tr>
<td>QPAS and SME</td>
<td>Incinerators, landfills</td>
</tr>
<tr>
<td>CBP via CTAC (Commercial Targeting</td>
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<tr>
<td>and Analysis Center)</td>
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</table>
When, Where, and How Does a Recall Happen?

- The goal is to start the recall as soon as possible after QPAS approval.
- Product recalled to one central location, possible additional locations – limited authority.
- Timeline is reasonable, usually six weeks.
- Send ARFA to CBP at the same time.
ARFA - Closing the pathway

- Shared info with CBP
- CBP targeted via various criteria and identified another importer
- Since August 2016, product recalled by four different importers
- Outreach was conducted and manufacturer is now compliant and on approved list

(Importer name here)

Wooden serving boards with bark intact (9” & 12”). Product lacks treatment certificate as per 7CFR319.40

1. CBP Entry #:
2. Consignee:
3. Country of Origin: China
4. HTS Code: 4419008000
5. Importer:
6. Manifested As: Other Wood Tableware, Kitchenware
7. Port of Entry (Code): 2704
8. Shipper:
9. Manufacturer (MID):
10. Importer IRS ID:
Recall stats 2014 - present

• Mid 2014 through Dec 2017: Completed 42 recalls for 52 products

• 2018 through July 31: Completed 11 recalls for 27 products
Recalled Products

Bird houses made of wood from China

Wooden garden markers from China
Recalled Products

Whole cucurbit seeds from India

Striga sp bird nests from China
Recalled Products

Whole lentils from Poland

Egg yolk pudding from Taiwan
Recalled Products

Wood wreath from China

Bamboo ski poles from Thailand
2016 Sportsman’s Guide furniture recall

- Brown fir long-horned beetle, *Callidiellum villosulum*, found in MN in pine wood furniture from China
- 313 units were sold to 206 customers in 44 states
- Collaborative effort between PPQ and the states resulted in furniture recovered from 172 customers - 83% compliance rate
- Also, 588 units on hold in warehouse were incinerated
2016 Kelly Barn furniture recall

- Velvet long-horned beetle, *Trichoferus campestris*, found in rustic wooden furniture from China
- Pest established in UT and IL and found in five other states
- MN and WI took lead and used stop sale and subpoena authorities
- Difficult to obtain sales records
- Sales to eight other states – SPROs and SPHDs contacted
- PPQ and MN supervised incineration of 144 recalled units
- Also, 639 units of furniture on hold in warehouse incinerated
2017 Hobby Lobby furniture recall

- One adult China fir borer, *Semanotus sinoauster*, found in fully finished wooden dresser (machine lathed and lacquered) from China
- Furniture was fumigated
- Approximately 360 units recovered from retail stores
- No additional specimens found
- Destroyed via deep land burial
PPQ response actions

• Sent official correspondence to China regarding pest emergence from “certified” wooden products. China responded that it has strengthened its oversight of quarantine treatments and use of phytosanitary certificates.

• Continue to collect data to assess the risk of wooden handicrafts from countries other than China.

• Implemented a multi-pronged policy approach…..
Multi-pronged policy approach

• Miscellaneous and Processed Products Import Manual – overhaul wood products section
• Dedicated Chinese handicrafts section
• APHIS Wooden Handicrafts website: https://www.aphis.usda.gov/plant-health/wooden-handicrafts
• Published approved Chinese manufacturers list
• Revised permit language
Manual Revision

• Improved the MPPM manual – wood products section is now more user friendly and geared towards real world examples, like Chinese handicrafts.

• Split out the handicrafts section for clarity – this action was taken in response to an increase in trade and pest pressure regarding Chinese handicrafts.
APHIS published a final rule in 2012 that defined the requirements for importing wooden handicrafts from China. This rule went into effect April 30, 2012. Since then, we have received numerous inquiries about the import requirements for wooden handicrafts from China. Answers to the most frequently asked questions are provided below.

**Why does APHIS regulate wooden handicrafts from China?**

**Is my product a wooden handicraft?**

**I want to import a wooden handicraft that was made in another country, not China. Does this information apply to me?**

**My wood product is not on the list above, but it is from China. What should I do?**

**What do I need to do to import a wooden handicraft from China?**
## List of approved Chinese manufacturers

<table>
<thead>
<tr>
<th>序号</th>
<th>所在省份</th>
<th>所在城市</th>
<th>企业名称</th>
<th>企业地址</th>
<th>注册登记编号</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>山西</td>
<td>运城</td>
<td>运城市德润天成家居有限公司</td>
<td>运城市盐湖区圣惠北路2号 NO. 2 SHENHUI NORTH ROAD, YANHU DISTRICT, YUNCHENG, SHANXI</td>
<td>1406ZMC0001</td>
</tr>
<tr>
<td>2</td>
<td>内蒙古</td>
<td>满洲里</td>
<td>满洲里宏丰木业有限公司</td>
<td>满洲里市合作区迎宾大道(交警队斜对面) YINGBIN ROAD, ECONOMIC COOPERATION ZONE, MANZHOULI (DIAGONALLY OPPOSITE OF TRAFFIC POLICE BRIGADE)</td>
<td>1501ZMC0002</td>
</tr>
<tr>
<td>3</td>
<td>内蒙古</td>
<td>呼伦贝尔</td>
<td>内蒙古阿里河华洲电子层压木有限责任公司</td>
<td>内蒙古鄂伦春旗阿里河镇 ALIHE TOWN, OROQEN COUNTY, INNERMONGOLIA, INNERMONGOLIA</td>
<td>1503ZMC0009</td>
</tr>
<tr>
<td>4</td>
<td>湖北</td>
<td>武汉</td>
<td>武汉中瀛画框有限责任公司</td>
<td>武汉市汉南区湘口经济开发区1号 No. 1 FRAMEUNION INDUSTRIAL ZONE, XIANGKOU, HANNAN, WUHAN, CHINA</td>
<td>4200ZMC0019</td>
</tr>
<tr>
<td>5</td>
<td>湖北</td>
<td>襄阳</td>
<td>襄阳程河工艺品有限责任公司</td>
<td>湖北省襄阳市襄州区程河镇孙岗路 SUNGANG ROAD, CHENGHETOWN, XIANGZHOU DISTRICT, XIANGYANG CITY, HUBEI PROVINCE CHINA</td>
<td>4202ZMC0001</td>
</tr>
</tbody>
</table>
Additional Information

Useful Documents & Links

- List of approved manufacturers
- Final Rule: Importation of Wood Handicrafts from China
- Manufacturer Requirements [excerpt from the Working Specification of Inspection and Quarantine Management for Wooden Handicrafts Exported to the U.S.]
- ePermits
- Electronic Code of Federal Regulations 7CFR 319.40 Subpart—Logs, Lumber, and Other Wood Articles [search for the word “handicraft” or jump to 7CFR 319.40-5(o)]

Contacts

- Wood.Permits@aphis.usda.gov
- State Plant Health Directors Directory
- Customer Service Telephone Number: 301-851-2046 or Toll free: 1-877-770-5990

Related Links

- ePermits
- Convention on International Trade in Endangered Species of Wild Fauna and Flora
- APHIS CITES/ESA Webpage
- USDA APHIS Lacey Act Webpage
- USDA APHIS Plant Health Import Information
- USDA APHIS Timber or Timber Products
Permit language

ANNEX -Z- IMPORTATION OF HANDICRAFTS FROM CHINA

(1) Wooden handicrafts from China that contain unmanufactured or partially processed parts that cannot easily be extricated from the other parts of the handicraft that are: Created with unmanufactured wood which is less than 1 cm in diameter OR The shipping boxes or items are labeled with the manufacturer's ZMC number of the approved facility in China that is shipping the material. The manufacturer must be on the list of approved manufacturers listed in: https://www.aphis.usda.gov/plant_health/downloads/crafts/chinese-wood-handicraft-industry
Important Things to Remember

- Recalls are voluntary and each recall is unique
- Decision to recall made by QPAS - based on pest risk and other factors
- Recalls usually extend only to the wholesale and retail sales level
- Recalls provide opportunity to establish/improve relationship with industry
- PPQ partners with CBP to close the import pathway
- PPQ communicates with trade partners regarding non-compliant incidents
- PPQ continues to address issues with imported wood products
Questions?