Controlled Import Permit (CIP)

How will the CIP affect NCPN?
It’s Prohibited…

verb
1. to forbid by authority or law.
2. to forbid the action.
3. to prevent; hinder.
Oxymoron

The Importation of Prohibited Plants Into the USA
319.8-20 Cotton Importations by the Department of Agriculture.
Cotton and covers may be imported by the Department of Agriculture for experimental or scientific purposes under such conditions as may be prescribed by the Deputy Administrator of the Plant Protection and Quarantine Programs, which conditions may include clearance through the New Crops Research Branch of the Plant Science Research Division, Agricultural Research Services.

319.15 Sugarcane Notice of quarantine.
(a) The importation into the United States of sugarcane and its related products, including cuttings, canes, leaves, and bagasse, from all foreign countries and localities is prohibited, except for importations by the U.S. Department of Agriculture for scientific or experimental purposes and importations authorized under a permit issued by the Department specifying conditions under which the materials have been or are to be subjected to mitigate any pest risk.

319.19 Citrus Notice of quarantine.
(a) In order to prevent the introduction into the United States of the citrus canker disease (Xanthomonas citri (Hasse) Dowson) and other citrus diseases, the importation into the United States of plants or any plant part, except fruit and seeds, of all genera, species, and varieties of the subfamilies Aurantioideae, Rutoideae, and Toddalioideae of the botanical family Rutaceae is prohibited, except as provided in paragraphs (b), (c), and (d) of this section.

(b) Plants or plant parts of all genera, species, and varieties of the subfamilies Aurantioideae, Rutoideae, and Toddalioideae of the botanical family Rutaceae may be imported into the United States for experimental or scientific purposes in accordance with conditions prescribed by the Administrator, Animal and Plant Health Inspection Service, United States Department of Agriculture.

319.24 Corn Diseases Notice of quarantine.
Importation is prohibited. However, this prohibition does not apply to importations of such items by the U.S. Department of Agriculture for scientific or experimental purposes. And further, when the public interests will permit, the Deputy Administrator of the Plant Protection

319.40-1 Logs, Lumber Departmental permit.
A document issued by the Administrator authorizing the importation of a regulated article for experimental, scientific, or educational purposes.

319.59-2 Wheat General import prohibitions; exceptions
(2) Imported pursuant to a departmental permit issued for such article and kept on file at the National Plant Germplasm Inspection Station;

319.74-3 Importations by the Department.
The U.S. Department of Agriculture may import cut flowers for experimental or scientific purposes under such conditions and restrictions as the Administrator may prescribe to prevent the dissemination of plant pests.

319.75 Khapra Beetle restrict the importation of certain articles from foreign countries and localities. Accordingly, no person shall import any restricted article unless in conformity with all of the applicable restrictions in this subpart.
(1) Imported by the U.S. Department of Agriculture for experimental or scientific purposes;
7 CFR319.37-2(a) lists articles from countries and localities that are prohibited articles and are prohibited from being imported or offered for entry into the United States except as provided in paragraph (c) of this section.

(c) Any article listed as a prohibited article in paragraph (a) or (b) of this section may be imported or offered for entry into the United States if:

(1) Imported by the United States Department of Agriculture for experimental or scientific purposes;
Overview

Containerized ocean shipping, air transport and open trade between countries.

USDA’s decreases direct plant imports.

Non Government Organizations (NGOs) and private business increase importation of plant commodities.
Fix Problems

Non- USDA entities and importation options

Scientific and Experimental purposes verses Developmental and Commercial

Risk to USA based upon intended use

Adaptable options for commodities yet to be invented
Solution Goal

Adapt APHIS’ established permit system as consistent and transparent.

Current import process and use of the commodities.

Address risk of prohibitive & restrictive plant imports.

Benefit to the American public, Scientific and Business Organizations.
What will be affected?

Sections within 7CFR 319 and 318

Issue permits less restrictive than conditions warranted.

&

Approved by the Secretary of Agriculture.
CIP Overview

The Controlled Import Permit is based upon a model that considers two aspects of the plant import system:

1. Perceived plant pest risk.

2. Intended use.
CIP Overview

Perceived Plant Pest Risk

Type of imported plants.

Import classification as historically prohibited.

“Modern” Pest Risk Assessment (PRA)
CIP Overview

USDA- APHIS regulates food and fiber crops
Recent trends for plant imports

Biotechnology
Chemical and medical product formulation
Biofuel
Non-edible applications ~ “environmentally friendly”
Importation of new varieties
Cleaner plants less pests
Alternative production practices
CIP Overview

Amend CFR sections 319 and 318

Remove all references of Departmental Permit
Expand authorized permit holders beyond USDA
Expand import beyond Scientific and Experimental
Shared oversight between PPQ Officials and Importer
CIP Overview

APHIS’ ePermit System

Communicate with permit applicants

Permit criteria established and uniform

All permits are consistent

Flexibility that can adapt to the future
CIP Classes

Five CIP classification levels based upon intended use and perceived risk
CIP Class

Class 1 ~ No grow out or destructive analysis

Class 2 ~ Some grow out with destructive analysis

Class 3 ~ Grow out separate pest free and release

Class 4 ~ Grow out, monitor, identify, resolve and release

Class 5 ~ Used when previous classes don’t apply
CIP 5
Case by case

CIP 4
Grow to validate, verify or treat for pest freedom, Release with no destruction

CIP 3
Collect pest free parts for propagation and release, then destroy original import

CIP 2
Destructive analysis after Evaluation or stasis period, then destroy original import

CIP 1
Analytical analysis and destructive analysis Then destroy original import

Perceived risk for dissemination of any plant pests increases

Broad intended use and least pest potential impact

Specific intended use and higher potential pest impact
CIP Annexes

Annexes are identifiers within the CIP Class

Specific process to a CIP Class

Addresses specific types of imports
CIP129
CIP Class 1 ~ destructive analysis
Annex 29 ~ Fresh collected plant prior to processing.

Herbarium Specimen where processes applied that render the sample sterile and incapable of propagation, stored in a collection for study
CIP Annexes Overview

CIP Class 2 ~ Some grow out then destructive analysis
Annex 29 ~ Fresh collected plant/ part prior to processing allowed to grow to flower production.

Herbarium Specimen that lacks flower identification, at maturity processes applied that render the sample sterile and incapable of propagation, stored in a collection for study.
CIP Annexes Overview

CIP Class 3 ~ Grow out; harvest; destroy plant; release portion of verified pest free

Annex 29 ~ collected plant part not affected by plant pest / disease of imported plant, release verified pest free portion.

Paddy rice imported to add genetic material to seed bank. Grow mother plant under monitoring. Harvest from verified clean plant. Seed is used as domestic.
CIP Annexes Overview

CIP P429

CIP Class 4 ~ Grow; monitor; remediate; release verified pest free

Annex 29 ~ imported plant possibly affected by plant pest/disease, monitor and verify pest freedom, remediate to eliminate pest, release when verified pest free.

Plant is imported from a country with a known quarantine pest, grow the plant for a period of time and monitor for plant pests, remediate by applied pesticide to eliminate, verify pest freedom, release plant
The permit requirements are likely to be individually stipulated and often a one time situation. The imported plant material may be destroyed or released from regulatory import control depending upon the unique situation and the requirements within the permit.
NCPN Permits

Historically Departmental Permits have been used for NCPN importation of plants.
Plants must be apparently free of plant pests at the time of import.

Pest permits issued for activities of Plant Pest Diagnostics and identification Requires a Pest Permit.
CIP 3 or 4 Permit

Depending upon the NCPN activities a CIP 3 or 4 permit may be issued.

Specific requirements will be listed in the SOP for the facility

One permit for all activities
CIP Permits are Collaborative

PPQ and the Permit holder will work in a cooperative process

Permit applicant describes activities and codifies the processes in the SOP

SOP reflects the work operations
PPQ Verifies Work

PPQ verifies work is conducted per the SOP

Communication with the State Plant Health Director staff

Reports documented in ePermit system
Questions

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