

# Import Plants Not Pests: Changes to Q-37

Continental  
Dialogue  
on Non-Native  
Forest  
Insects & Diseases

# Reason for Engagement:

- January 2007 Vision, Goal 1:  
Improve federal, state, and provincial programs so as to prevent new Non-Native Forest Insects and Diseases from arriving on the continent by the year 2015.
  - The Dialogue's January 2007 meeting put highest priority on the live plant importation pathway because
    - significance
    - opportunity (on-going rulemaking)
- Opportunity Work Group 1 was asked to develop a consensus position.

# Members of the Team

- Faith Campbell, The Nature Conservancy (chair)
- Jerry Carlson, NY Dept. of Environmental Conservation
- Emily Davis, International Paper, Forest Resources
- Bob Fledderman, MeadWestvaco
- Deborah McCullough, Michigan State University
- Anand Persad, Davey Tree Company
- Gray Haun, TN Department of Agriculture  
(*Resource*)
- Marc Tefteau & Craig Regelbrugge, ANLA (*ex-officio*)

Improve federal, state, and provincial programs so as to prevent new Non-Native Forest Insects and Diseases from arriving on the continent via the pathway of imported plants by the year 2015.

# Team's Premises (1)

**Preventing introduction via this high-risk pathway would entail:**

- **Importation of only those plants that are free of regulated pests and essentially free of other pests,**
- and
- **Early detection of residual pests and potential pests to enable cost-effective and successful eradication.**

## Premises (2)

- **The Dialogue believes that the current Q-37 regulations are not adequately effective and we applaud APHIS for proposing revisions.**
- **APHIS must have additional resources to adopt and implement Q-37 regulations on a timely basis.** Consider developing private sector opportunities to provide additional funding sources, expertise and mechanisms.

## Premises (3)

### **A systems-based approach offers great promise**

Should contain the following key elements:

- Encourages importers & exporters to develop BMPs that ensure plants are essentially pest-free
- Identifies pests at origin, before introduced
- Increases resources & incentives for pre-shipment inspection
- Incorporates costs of eradication & quarantine into cost/benefit analyses of trade policies
- Ensures compliance with WTO & IPPC requirements

# Interim Actions while developing & implementing systems-based approach

During period while agency & industry are implementing systems-based approaches, APHIS should pursue immediate risk reduction in the following situations:

- plants being imported from new sources/origins;
- plants being produced for import using unexpected horticultural methods that may pose additional risk;
- when new pests are reported or intercepted from a production area;
- when scientific information including but not limited to peer-reviewed publications suggests that a host/origin combination poses a risk but a PRA has not yet been completed.



## Interim actions (continued)

Strategies to reduce risk immediate might include such options as

- Temporarily prohibit imports of certain plants thought to pose too great a risk (NAPPRA)
- Increase intensity of inspections
- Require more plants to undergo post-entry quarantine
- Require mandatory disinfection of incoming shipments

## Interim actions (continued)

- USDA-APHIS should publicly specify a timeline within which the agency - in collaboration with industry - will swiftly act to reduce significantly the risk of introductions via live-plant imports while more comprehensive programs are developed

## Interim Actions (continued)

- APHIS should implement a categorized risk system based on the risk associated with broad plant groups and geographic regions of origin.
- APHIS should use its proposed NAPPRA program to temporarily prohibit importation of plant/origin combinations that have not been subject to PRA when there is no importation track record indicating freedom from actionable or new pests.

# Long-Term Solution: Best-Management Programs

- Encourage Dialogue participants to support such programs
- Incentives to encourage participation by importers & exporters:
  - not place extraordinary monetary burdens or lengthy delays on participants
  - serve as a working model for virtual elimination of pests via this pathway by 2015
  - encourage & reward participants in programs
  - encourage & reward participants that promptly report pests.
  - might include low-cost insurance or compensation to cover losses arising from an exotic pest infestation that occurred despite implementation of the BMPs.

# Additional Actions

- Support development of a strategic plan for APHIS Plant Inspection Stations – stronger staffing & technology
- Improve & expand post-entry quarantine
  - Require quarantine of additional imports that pose pest risk -- especially latent or hard-to-detect pests
  - Establish oversight system for privately operated PEQ facilities

# Next Steps – Discuss in Breakout

Help convey the consensus position to policymakers and other stakeholders – through

- Development & dissemination of outreach tools targeting your organizations' members, such as websites, newsletters, and presentations to regular meetings
- Outreach to stakeholders not already engaged in the Dialogue
- Outreach to media outlets which cover conservation, forestry, or horticultural issues
- Joining *ad hoc* coalitions of Dialogue member organizations to meet with USDA leadership
- Joining *ad hoc* coalitions to meet with key members of Congress, particularly those serving on the Agriculture or Agriculture Appropriations subcommittees