# ISPM 15: State Perspective

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## ISPM 15

- IPPC mark meets entry requirement.
- Full implementation began July 5, 2006.
- 137 (?) contracting parties.
- No treatment certificate required.
- A good start, but needs improvement.
- Very time-consuming to make changes.

# Compliance Rate

- Compliance rate about 95 percent.
- Non-compliant shipments worrisome.
- Also worrisome is occasional detection of pests in compliant shipments.

## Pest Introductions

- Nationally, Houston receives largest numbers of vessels.
- Largest numbers of pest interceptions (30%) occur at Texas ports of entry; CA, 20%. (Mexico, Italy, China).
- About 800 pest detections occur yearly (53% are scolytids; 69% in Texas). While risk-based, only a fraction of the cargo inspected.

## Impact on States

- Pests that escape cost states, other governmental agencies, citizens to control, contain or eradicate.
- EAB in 13 states, and ALB in 4 states.
- State resources required to investigate complaints.

# IPPC Mark and Treatment Verification

- Trust but verify.
- No way to know if IPPC mark provided by NPPO.
- No way to verify if SWP actually treated.
- Most pests controlled with the treatment, but not all.

## Fines/Penalties

- CBP assesses penalties; APHIS needs to step up its efforts.
- Fraudulent mark penalizes US importer.
- No on-the-spot penalties like for passengers or for shipments with garbage violations.

#### Interstate Movement

- Treatment requirements can be confusing for businesses.
- For example businesses in Wisconsin have to keep track of 3 heat treatment temperatures and durations.
- Increases chances of human error.

# Suggestions

- Enhance enforcement.
- Target previous violators.
- Analyze interception patterns.
- Develop quality control tools.
- Hold dialogue with companies/countries with greater number of violations.