

February 2, 2004

USDA APHIS-PPQ Stakeholder Meeting Report

Sue Tolin represented the American Phytopathological Society, at the APHIS Plant Protection and Quarantine (PPQ) Stakeholder Meeting December 9-10, 2003. The purpose of the meeting was to update stakeholders on current issues in PPQ and provide a forum for stakeholders to provide feedback to the agency concerning its mission, and issues PPQ must address to maintain relevance and credibility as a plant health organization. A series of talks provided perspectives on PPQ's interactions and relations with state, tribal, and industry stakeholders, as well as with the Department of Homeland Security (DHS). This was followed with discussions of PPQ's pest detection initiative, an incident command system, global pest and disease detection and information systems, and innovative approaches to quarantines and mitigating risk. A summary of these presentations is to be posted on the PPQ website <http://www.aphis.usda.gov/ppq/>.

The meeting concluded with five concurrent panel discussions. Four panels were "Pest Risk Assessments," "Stakeholder Role in the DHS," "Strategic Approaches to Exports," and "Integrating Players in the Incident Command System." In the fifth, "Import Permits and Export Certification – Service, Standardization, Security, Automation," Tolin was invited to participate. Other panelists were: **Mike Furko**, assistant director, Plant Health Programs, APHIS; **Parul Patel**, senior export specialist, PPQ-APHIS; **Bill Gimpel**, National Plant Board (Maryland); **Jeanne Porter**, Action International Inc./Custom House Broker; and **Mike Willett**, Northwest Horticultural Council.

For PPQ, Furko presented changes in the regulatory system and permit requirements for any plant pest. Currently the average time to complete state review, facility inspection and environmental assessment and issue the '526' permit is 43 days. An electronic or e-Permit system is forthcoming. Issues being emphasized are assuring that individuals issued a permit acknowledge and comply with conditions of the permit, and destroy organisms when the permit expires.

APS was the only scientific society participating as an APHIS stakeholder, and speaking for public and private sectors scientists conducting research and educational activities with organisms causing plant diseases. Tolin raised the following key issues on behalf of APS members.

- For movement of plant pests interstate and intrastate, even common domestic organisms, the issuing of '526' permit has practically stopped since September 11. Members have been unable to get or renew permits. The length of time the permit is in effect, when it is issued, may not be sufficient to get the research completed. Lack of timely permits compromises funding and graduate training. Service must improve; automation and electronic filing will be welcomed.
- *Lack of standardization* in conditions being imposed for the conditions of the permits. Decisions on conditions are not risk-based nor based on organism dispersal mechanisms, as each APHIS inspector appears to use different parameters to reach their assessment. We greatly need *transparency* and *consistency* in the permitting process, and *guidance* to scientists and their institutions on the requirements needed for safe conduct of their activities. Models such as the standards set out in the Appendices to the NIH Guidelines for Research with

Recombinant DNA-Containing Organisms, or the CDC Guidelines for working with human pathogens have been successful and widely used by the scientific communities, both public and private, but not by PPQ.

- The interpretation that plant pathogens require the equivalent of BSL-3 level containment should be reconsidered. We have the select agent list, with the additional permits and conditions needed for these organisms. Although the OIG report apparently suggests similar conditions to cover ALL pathogens and plant pests, regardless of risk level, the expense for such facilities, both construction and maintenance of operations, exceeds the risk in nearly all cases, as well as the available funding. APS has long urged APHIS PPQ to consider a risk categorization of plant pathogens.
- Imported cultures of organisms can no longer be hand-carried, but must be shipped via a bonded courier. Biological organisms perish during shipment. Even with proper permits, shipments of organisms do not get through Port Inspectors to scientists in a viable condition.
- The APS considers that PPQ permits should facilitate, not hinder, research activities - diagnosis and detection, taxonomy, molecular diversity, host specificity, and investigations in support of offshore programs, as well as describing new, emerging, and re-emerging disease agents. Education and outreach programs must also be facilitated in order to train taxonomists, first responders, and other stakeholders. Permits should be issued with recommended conditions under which dispersal from confinement is minimized, commensurate with risk of the organism. At the same time, conditions under which release to the environment is permitted must be included to allow for development and evaluation of control measures. Although PPQ focuses on prevention, the scientific community must address preparedness, and should not be overly restricted in doing this important task.

The “Permits” panel was well-attended by a lively and inquisitive audience. There was considerable agreement with the issues raised by APS. Several stakeholders said their main reason for attending the meeting was to raise questions on the permitting process.

Four key issues and needs were identified and reported to the entire conference. These were:

- (1) The need for process improvement in timeliness, automation, and standardization of permitting, and in education/communication. Although 526 permits are issued to individuals, there was a suggestion that the institution or company of employment should be involved.
- (2) Improved collaboration with state and local facilities, as well as interagency (DHS, F&W, HHS, FAA, FDA, SI), intra-agency (APHIS, VS, BRS, GIPSA) and international.
- (3) Recognition that permits for research or educational purposes have different needs than do those for commercial purposes.
- (4) Elimination hand-carried items of permitted organisms because of the new requirement for bonded carriers.

Again, the proceedings of the conference are to be posted at <http://www.aphis.usda.gov/ppq/>, under title of PPQ Stakeholders Meeting Summary. If you have additional comments or questions about APS activities on this issue, please send comments to the Public Policy Board chair **John Sherwood** (sherwood@arches.uga.edu) or to Sue Tolin (stolin@vt.edu).