



Results from the Survey on the APHIS Permitting Process

The American Phytopathological Society (APS), the Entomology Society of America (ESA), the Society of Nematologists (SON), and the Mycological Society of America (MSA) all aspire to prevent the introduction and movement of pests that could impair the safety, availability, and affordability of our food, feed and fiber. These societies support the APHIS-PPQ mission to protect U.S. animal and plant health and recognize that regulation of certain pests is essential. To better understand the impact that the current 526 permitting process is having on research and the ability to respond to outbreaks of pests and pathogens, we surveyed our members. In the survey, most respondents recognized that certain pests need regulation; however, 80% of the respondents stated that the current permitting processes negatively impact the ability of plant health specialists to serve the common good and thwart their efforts to protect the nation's food supply. Thus, despite the many steps APHIS-PPQ has already taken to improve the process, the current permitting and regulatory processes continue to negatively impact agricultural productivity, affordability and security. We look forward to resolving the issues raised by this recent survey.

Conclusions from the recent survey were¹:

- the permit system does not reflect the current global situation, pest risks, and needs of the country
- permits are not issued in timely manner and the process is cumbersome
- lapses in the permit system do not account for new invasions (recent examples are the movement of Sudden Oak Death to the eastern United States, and the arrival of Soybean Rust in the United States)
- investments of the permit system resources are not focused where the greatest risk occurs, e.g. widespread, endemic pathogens receive the same scrutiny as exotic pathogens
- containment conditions are inconsistent with the levels of risk
- the required use of bonded carriers to import pathogens increases costs and viability of the shipped organisms is frequently lost

Frustration, difficulty, or delays with the permitting process have led to:

- destruction of valuable culture collections
- delay or abandonment of research and loss of funding
- reduction in critical research collaborations because cultures cannot be exchanged in a timely manner
- negative impacts on training, as permits are received after classes or workshops are completed
- obstruction of graduate student, visiting scholar, and post doc research programs
- cost in time of scientist and staff pursuing permits
- loss of revenue for industries dependent on permits
- reduction in biosecurity as positive controls for diagnosis cannot be readily obtained
- restricted ability to do research in taxonomy/systematics/identification.

We urge that the APHIS modify the current 526 permitting system to help APHIS and plant health specialists in the public and private sectors ensure that the U.S. has a safe, viable, and competitive agricultural production system:

- Improve the efficiency and clarity of the application process
 - institute an online process for submission and tracking of applications
 - provide informative and explicit instructions with examples of Standard Operating Procedures, etc.
 - provide applicants with a reasonable estimated timeline for the permitting process
- Improve communications at all stages of the process
 - provide rapid, accurate and timely responses to queries
 - institute a feedback mechanism to evaluate programs and personnel
- Develop and institute regulations based on science and probabilities
 - Use quarantine principles and regulations to determine risk and need to regulate
 - Allow the movement of widely prevalent plant pathogenic organisms in the US to be regulated at the local level
 - Increase the duration of the permits to enable completion of research projects and to reduce workload of APHIS personnel

¹ The first six survey findings reiterated a number of the conclusions from the July 1999 "Safeguarding American Plant Resources" APHIS-PPQ Stakeholder Review.