



# Improving Supplemental Permit Conditions for APHIS-BRS Permits

March 8, 2018



# Welcome to BRS' Webinar on:

*Improving Supplemental Permit Conditions  
for APHIS-BRS permits*



# **7 CFR part 340.4: Permits for the Introduction of a Regulated Article**

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*(f) Permit conditions.*

*A person who is issued a permit and his/her employees or agents shall comply with the following conditions, and any supplemental permit conditions which shall be listed on the permit, as deemed by the Administrator to be necessary to prevent the dissemination and establishment of plant pests*

# ***7 CFR part 340: Information Collection***

- BRS updated its information collection, with approval from OMB, in February 2017.
- Information collections have a 3-year life cycle
  - The APHIS-BRS Information Collection, formally known as OMB 0579-0085, is in place until February 2020

# ***7 CFR part 340: Information Collection***

- APHIS-BRS' information collection allows for all information collection under current regulatory authority of 7 CFR 340
  - Specifically, any stated regulatory requirement to authorize permitting, acknowledge notifications, analyze petition submissions, or for compliance assurance (as detailed in OMB 0579-0085)



# Number and Type of Permits, FY 2017

	Micro-organisms	Arthropods	Plants	TOTAL
Import	15	7	25	47
Interstate Movement	78	9	66	153
Interstate/Release	1	0	78	79
Release	5	1	55	61
TOTAL	99	17	224	340



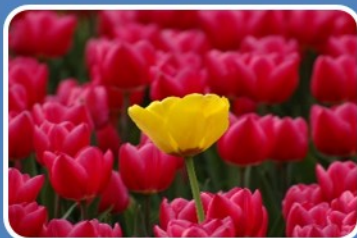
## Standard Permit Conditions

- Found at 7 CFR 340.4(f)
- Apply to ALL permits



## “Standard” Supplemental Conditions

- “Standard” supplemental conditions have been developed for various permit types, e.g. field release of a microbial plant pest
- All permits have supplemental conditions



## Permit-Specific Supplemental Conditions

- Unique - Tailored to address risks specific to an individual permit

# Potential Breakdowns



- Permit conditions not clear to:
  - Permittees and cooperators
  - APHIS inspectors
- Inconsistency across permits
- Leading to
  - Inadvertent noncompliance
  - Oversight & enforcement challenges



# BRAP/ROP Project on Permit Conditions



All permit conditions are:

- Clear
- Consistent
- Commensurate with risk

## Two Phase Roll-Out

- Phase 1
  - Updates that don't involve changes in record keeping or reporting
  - Planned start date June 30, 2018
- Phase 2
  - Updates that do or may involve changes in record keeping or reporting
  - Planned start date January 1, 2019
- The discussion today does not include all updates to conditions for PMPI plant releases



# Questions?

To reach us after today's webinar, please  
email us at:

[biotechquery@aphis.usda.gov](mailto:biotechquery@aphis.usda.gov)