

# POLICY AMENDMENT FORM

Amendment to: **Animal Health Protection and Disease Control  
& Plant Health Protection and Disease Control**

AP-1

Section Number /Title to Be Amended: **1.2 Animal Health Issues  
and 2.3 Foreign Plant Pests and Disease Issues**

Subject of Amendment: **Performance Measures for Agricultural Quarantine Inspections**

Submitted By: **A.G. Kawamura and Charles Bronson** CA & FL

Amendment Text:

## **1.2 Foreign & Domestic Animal Health Issues**

- Homeland Security and Agriculture

~~NASDA strongly supports the Department of Homeland Security ("DHS") in its efforts to protect the nation against threats to the homeland, especially after the events of September 11, 2001, and the anthrax incidents that followed.~~

~~The agriculture quarantine inspection staff and functions from USDA APHIS were transferred to the Department of Homeland Security, Customs and Border Protection. The stated priority for the DHS is preventing terrorists and terrorist weapons from entering the United States. Introductions of foreign animal diseases, such as Exotic Newcastle Disease and emerging diseases, such as West Nile Virus, Avian Influenza and Chronic Wasting Disease are of great concern to the U.S. agricultural economy, and to the nation's livestock, and animal resources.~~

~~While the prevention of terrorists and terrorist weapons from entering the United States is vital to the security of the nation, so too, is the protection of the nation's food supply, our agricultural economy, and animal health. It is essential that the relationship between the DHS and APHIS offers the greatest reduction in risks, establishes a consistent and clear communication structure, and provides for problem resolution with built-in accountability. NASDA urges increased emphasis be placed by DHS on the mission of safeguarding agriculture to include specific funding opportunities for State Departments of Agriculture through the Office of Domestic Preparedness.~~

NASDA strongly supports the pest exclusion mission area known as Agricultural Quarantine Inspection (AQI) at the nation's ports of entry that serve to protect our domestic agriculture industry from a foreign pest or disease incursion. After the events of September 11, 2001 and the anthrax incidents that followed, AQI functions were transferred from the United States Department of Agriculture (USDA) to the newly created Department of Homeland Security ("DHS") in an

effort to consolidate all governmental functions that protect the nation against threats to the homeland into one agency. NASDA strongly supports the mission and efforts of DHS to prevent terrorists and terrorist weapons from entering the United States. While the prevention of terrorists and terrorist weapons from entering the United States is vital to the security of the nation, so too, is the protection of the nation's food supply, our agricultural economy, and animal health. Introductions of foreign animal diseases, such as Exotic Newcastle Disease and emerging diseases, such as West Nile Virus, Avian Influenza and Chronic Wasting Disease, are of great concern to the nation's livestock and animal producers and could cause significant impacts to the nation's agricultural economy.

Unfortunately, since the AQI transfer, pest and disease introductions have increased dramatically. It is clear that DHS' administration of the AQI program lacks efficacy and currently there are no performance measures relative to AQI functions that DHS must meet to ensure the resources that DHS receives to protect the U.S. domestic agriculture sector are being utilized for this purpose. In addition, in order for AQI to remain effective while housed at DHS, it was essential that DHS and APHIS establish a consistent and clear communication structure that provides for problem resolution with built-in accountability in order to provide the greatest degree of risk reduction. Unfortunately, DHS' mission is so broad that AQI is not viewed within the agency as a critical function either in terms of staffing or funding. Therefore, NASDA supports the re-assignment of the AQI mission area back to USDA APHIS given that they have the expertise to carry out a focused, coordinated and effective agricultural safeguarding effort and are statutorily charged with managing exotic pests and diseases.

NASDA urges that increased emphasis be placed on the mission of safeguarding agriculture and strongly supports the immediate adoption of quantifiable performance measures for AQI functions to ensure the program is meeting the statutory mission for which it was created – protecting American agriculture from a foreign plant or animal pest or disease. These performance measures should consider the interdiction, control, eradication and suppression costs borne by state and local governments for foreign pests and diseases that AQI fails to interdict at the ports of entry. These costs shall be assessed to the budget of the parent department of AQI. In addition, NASDA urges DHS' Office of Domestic Preparedness to provide specific funding opportunities to state departments of agriculture for local preparedness similar to grants provided to state departments of health.

## **2.3 Foreign Plant Pests and Disease Issues**

### Homeland Security and Agriculture

~~NASDA strongly supports the Department of Homeland Security ("DHS") in its efforts to protect the nation against threats to the homeland, especially after the events of September 11, 2001, and the anthrax incidents that followed.~~

~~The agriculture quarantine inspection staff and functions from USDA APHIS were transferred to the Department of Homeland Security, Customs and Border Protection. The stated priority for the DHS is preventing terrorists and terrorist~~

~~weapons from entering the United States. Introductions of foreign plant pests and diseases, such as Asian long-horned beetle, and Plum pox virus are of great concern to the U.S. agricultural economy, and to plant and animal health. The orderly flow of trade and timely inspections of perishable items are vital to agriculture and to agribusiness. The introduction of foreign or invasive plant pests remains a constant threat to nation's agricultural crops and forests.~~

~~While the prevention of terrorists and terrorist weapons from entering the United States is vital to the security of the nation, so too, is the protection of the nation's food supply, our agricultural economy, and plant health. It is essential that the relationship between the DHS and APHIS offers the greatest reduction in risks, establishes a consistent and clear communication structure, and provides for problem resolution with built-in accountability. NASDA urges increased emphasis be placed by DHS on the mission of safeguarding agriculture and plant resources.~~

NASDA strongly supports the pest exclusion mission area known as Agricultural Quarantine Inspection (AQI) at the nation's ports of entry that serve to protect our domestic agriculture industry from a foreign pest or disease incursion. After the events of September 11, 2001 and the anthrax incidents that followed, AQI functions were transferred from the United States Department of Agriculture (USDA) to the newly created Department of Homeland Security ("DHS") in an effort to consolidate all governmental functions that protect the nation against threats to the homeland into one agency. NASDA strongly supports the mission and efforts of DHS to prevent terrorists and terrorist weapons from entering the United States. While the prevention of terrorists and terrorist weapons from entering the United States is vital to the security of the nation, so too, is the protection of the nation's food supply, our agricultural economy, and plant resources and health. Introductions of foreign plant pests and diseases, such as Asian long-horned beetle, Emerald Ash Borer, Light Brown Apple Moth and Plum pox virus are of great concern to the U.S. agricultural economy, and to plant and animal health. The orderly flow of trade and timely inspections of perishable items are vital to agriculture and to agribusiness. The introduction of foreign or invasive plant pests remains a constant threat to nation's agricultural crops and forests.

Unfortunately, since the AQI transfer, pest and disease introductions have increased dramatically. It is clear that DHS' administration of the AQI program lacks efficacy and currently there are no performance measures relative to AQI functions that DHS must meet to ensure the resources that DHS receives to protect the U.S. domestic agriculture sector are being utilized for this purpose. In addition, in order for AQI to remain effective while housed at DHS, it was essential that DHS and APHIS establish a consistent and clear communication structure that provides for problem resolution with built-in accountability in order to provide the greatest degree of risk reduction. Unfortunately, DHS' mission is so broad that AQI is not viewed within the agency as a critical function either in terms of staffing or funding. Therefore, NASDA supports the re-assignment of the AQI mission area back to USDA APHIS given that they have the expertise to carry out a focused, coordinated and effective agricultural safeguarding effort and are statutorily charged with managing exotic pests and diseases.

NASDA urges that increased emphasis be placed on the mission of safeguarding agriculture and strongly supports the immediate adoption of quantifiable performance measures for AQI functions to ensure the program is meeting the statutory mission for which it was created – protecting American agriculture from a foreign plant or animal pest or disease. These performance measures should consider the interdiction, control, eradication and suppression costs borne by state and local governments for foreign pests and diseases that AQI fails to interdict at the ports of entry. These costs shall be assessed to the budget of the parent department of AQI. In addition, NASDA urges DHS' Office of Domestic Preparedness to provide specific funding opportunities to state departments of agriculture for local preparedness similar to grants provided to state departments of health.

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