

2

Export Certification
Manual

Procedures

Inspection Guidelines

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Introduction

This section of the *Procedures* chapter covers the inspection guidelines that Authorized Certification Officials (ACOs) should follow when sampling, inspecting, and verifying eligible plants or plant products offered for export certification. These inspection guidelines are general and can be used for a majority of the plants or plant products offered for export.

There are supplemental inspection procedures listed elsewhere in this manual, which have been established specifically for plants or plant products that warrant special attention and include the following:

- ◆ Certification of plants in growing media for export to European Union (see *Special Procedures, **Plants in Growing Media and Containers to European Union*** on page 3-7-1)
- ◆ Compliance agreements for compressed, baled cotton (see *Special Procedures, **Compliance Agreements for Compressed, Baled Cotton*** on page 3-2-1)
- ◆ Coniferous solid wood packing material (see *Special Procedures, **Mill Certification Programs for Coniferous Sawn Wood*** on page 3-6-1)
- ◆ Containerized oak lumber (see *Special Procedures, **Containerized Oak Lumber*** on page 3-3-1)

- ◆ Mail exports (see *Special Procedures*, **Mail Exports** on page 3-5-1)
- ◆ Protected plants (ESA and CITES material) (see *Special Procedures*, **Processing Protected Plants** on page 3-8-1)

Inspection Preparation

During the preliminary assessment, one of the pieces of information received from the exporter is the tentative shipping date. When the shipping date is known, ACOs can plan enough lead time for laboratory examinations and visual inspections in order to meet any time limit specified by the importing country. If specified by a foreign country, the time limit between inspection and exportation is listed in the export summary under the definition of phytosanitary certificate (PC). If a time limit is **not** specified in the export summary, then the general time limit for inspections is **not** more than 30 days before export. (See **Table 2-4-3 on page 2-4-9** for known time limits specified by some countries.)

Arrangements for inspections are to be coordinated with the appropriate shipping official in order to determine the availability of the plants or plant products for inspection, their location, and the loading time. Inspections should **not** begin until the plants or plant products are all together, clearly marked, and labelled. (See *Procedures, Preparation*, **Exporter or Shipper** on page 2-1-17 for their roles and responsibilities to make the plants or plant products available for inspection.)

General Inspection Guidelines

Inspection and verification of plants or plant products offered for export certification helps ACOs determine whether the shipment meets the import requirements of the foreign country. ACOs should see the export summary of the foreign country **before** beginning their inspection and verification. Foremost, ACOs should review presented import permits or special authorizations to ensure that the shipment meets the phytosanitary requirements listed in these official documents because they usually supersede an export summary.

After identifying the import requirements in an export summary or an import permit, then inspect the shipment. See **Figure 2-4-1 on page 2-4-3** for a list of the main inspection steps followed by detailed guidelines.

- Step 1: Determine if the Exporter Has an Acceptable Inspection Certificate That Would Preclude an Additional Inspection**
- Step 2: Check the Shipping Date for Enough Lead Time**
- Step 3: Determine the Sample Size to Inspect**
- Step 4: Compare Shipment to Supporting Documents**
- Step 5: Inspect the Plants or Plant Products**
- Step 6: Obtain Pest Identity**
- Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest**
- Step 8: Look for Unauthorized Packing Material**
- Step 9: Record Inspection Results**
- Step 10: Prepare a Federal Plant Export Certificate**

FIGURE 2-4-1: Overview of General Inspection Guidelines

Step 1: Determine if the Exporter Has an Acceptable Inspection Certificate That Would Preclude an Additional Inspection

USDA-APHIS-PPQ, through Memorandums of Understanding, cooperates with other Federal agencies to conduct the phytosanitary inspection of specified commodities. Currently, USDA-APHIS-PPQ works cooperatively with Grain Inspection, Packers and Stockyards Administration (GIPSA), Federal Grain Inspection Service (FGIS), to inspect grain and some grain products. These official inspections are documented on inspection certificates. Therefore, these guidelines begin by an ACO determining if the exporter has an acceptable inspection certificate issued by another Federal agency that would preclude an additional inspection.

1. Find out if the exporter has an acceptable inspection certificate from another agency or organization. While it is impossible to list and provide example of all inspection certificates, a list of acceptable inspection certificates are in [Figure 2-4-2](#); a list of unacceptable inspection certificates are in [Figure 2-4-3](#). See [Appendix D](#) for some examples of both acceptable and unacceptable inspection certificates.



All official GIPSA certificates will show the FGIS seal in the center of the certificate. The seal indicates that the grain was officially sampled and inspected by FGIS or an official agency working under GIPSA authority.

The FGIS seal is **not** on the certificates used for rice and pulses (dry beans, peas, lentils).

An inspection certificate can be accepted **only** if both the following conditions are met:

- ❖ Agency's or organization's inspectional procedures are routinely monitored by USDA-APHIS-PPQ personnel
 - ❖ Inspection certificate is the original (a faxed copy of the original is acceptable when the certificate is faxed directly from the issuing agency and the accountable number is marked on the original Federal plant export certificate before being faxed)
2. Decide whether an additional inspection (beyond verification) is necessary. Base your decision on the following:
 - ❖ Ability to meet time limits specified by the foreign country
 - ❖ Credibility of the agency that conducted the inspection
 - ❖ Import requirements specified by the foreign country
 - ❖ Presence (or absence) of an acceptable inspection certificate from another agency or organization
 - ❖ Reliability of the statements made on the certificate

3. Use [Table 2-4-1](#) to take the appropriate action.

TABLE 2-4-1: Decide to Inspect Eligible Plants or Plant Products

If the exporter:	And you decide to:	Then:
Has an acceptable inspection certificate from another agency or organization for eligible plants or plant products	Verify only the contents of the shipment (relying on the acceptable inspection certificate as the basis for your certification)	1. VERIFY the contents of the shipment 2. SKIP to Step 9: Record Inspection Results on page 2-4-20
Lacks an acceptable inspection certificate	Conduct an additional inspection 	GO to Step 2: Check the Shipping Date for Enough Lead Time on page 2-4-8

Issuing Agency/ Organization	Form Number	Form Title and Notes
Agricultural Marketing Service (AMS) ¹	FV 146	Certificate of Quality and Condition (Processed Foods)
	FV 147	Certificate of Quality and Condition (Processed Foods) Quality Assurance
	FV 149	Certificate of Quality and Condition (Processed Foods) Continuous Inspection
	FV 294	Report on Sanitary Inspection (issued for apples, pears, emperor grapes, and some vegetables)
Federal Grain Inspection Service (FGIS) ²	FGIS 905-1	Official Grain Inspection, Official Sample-Lot Inspection
	FGIS 905-L	Laser printed FGIS 905
	FGIS 909	Official Export Grain Inspection Certificate
	FGIS 909-1	Official Export Grain Inspection Certificate-Divided Lot
	FGIS 909-1L	Laser printed FGIS 909-1
	FGIS 909-2	Official Export Grain Inspection Certificate
	FGIS 921-2	Inspection Report—Insects in Grain (should be used in conjunction with its log and/or appropriate certificate)
	FGIS 956	Rice Inspection Services Certificate
	FGIS 956-1	Rice Inspection Services Certificate
	FGIS 956-L	Laser printed FGIS 956
	FGIS 993	Commodity Inspection Certificate
FGIS 993-L	Laser printed FGIS 993	
Florida	FV 185-C	Florida Export Citrus Fruit Inspection Report
Oregon	Inspection Report	Oregon State Seed Laboratory Inspection Report
Washington	Inspection Report	Washington Phytosanitary Grain Inspection Report
Various States	State phytosanitary certificate	Use only to attest to the import requirements of a foreign country that cannot be ascertained at the time of export (e.g., growing season inspection, freedom from certain pests at the place of growing or production, specific origin)

FIGURE 2-4-2: Acceptable Inspection Certificates

- 1 In cases where the AMS form **does not** meet a foreign country's import requirements, then it will be necessary to either obtain a State phytosanitary certificate attesting to the requirements or conduct an additional inspection or treatment. For example, if freedom from specific quarantine pests is required by a particular country and the pests are **not** listed on FV Form 294 issued by AMS, then an additional phytosanitary inspection **must** be conducted before the fruits can be certified. Also, specific statements may be required on the form relating to sampling guidelines and freedom from pests. For example, when fruits are being inspected from Colombia, Brazil, or Venezuela, the following statement is required on the form, "This fruit was inspected for exports to [enter destination country] and was found free of colding moth, San Jose scale, and apple maggot. The rate of inspection was 2 percent with 1 percent of that being cut."

- 2 In cases where an acceptable FGIS inspection certificate is used as the basis for issuing a Federal plant export certificate, the exporter or GIPSA inspector **must** contact a local ACO to identify the phytosanitary import requirements in preparation for the GIPSA inspection.

Issuing Agency/Organization	Form Number	Form Title and Notes
Agricultural Marketing Service (AMS)	FV 184	Federal-State Inspection Certificate
Federal Grain Inspection Service (FGIS)	FGIS 914	Official Certificate, Submitted Sample Inspection
	FGIS 915	Official Stowage Examination Certificate
	FGIS 916	Official Certificate
	FGIS 994	Commodity Certificate, Submitted Sample Inspection
	IN 415	Official Certificate, Warehouseman's Sample, Lot Inspection

FIGURE 2-4-3: Unacceptable Inspection Certificates

Step 2: Check the Shipping Date for Enough Lead Time

When inspecting a shipment of eligible plants or plant products for export certification, check the following:

- ◆ Whether a laboratory examination is required by the foreign country as a condition of entry (e.g., bacteria, fungi, nematodes, viruses) or to determine freedom from specified plant pests
- ◆ Shipping date to make sure there is enough lead time for a laboratory examination and to plan for visual inspections in order to meet any time limit specified by the foreign country

When laboratory examinations are required, see [Table 2-4-2](#) for the appropriate action to take.

Otherwise, note if there is a specified time limit between inspection and exportation listed in the export summary under the definition of phytosanitary certificate. If a time limit is **not** specified in the export summary, then the general time limit for inspections is **not** more than 30 days before export. (See [Table 2-4-3 on page 2-4-9](#) for known time limits specified by some countries (updated annually; see the export summary for the most current time limits).)

TABLE 2-4-2: Action When a Laboratory Examination Is Required

If there is:	Then:
Not enough lead time ¹	1. INFORM the exporter to apply for official sampling far enough in advance of the shipping date to allow for the laboratory examination 2. RESCHEDULE inspection to fit the new shipping date to allow enough lead time 3. RETURN to this decision table and follow the steps listed in the cell below
Enough lead time ¹	1. DRAW an official sample (see guidelines for drawing an official sample on page 2-4-11) 2. SEND the official sample to the nearest identifier, public university or public laboratory, or an accredited laboratory as conditions warrant ² 3. KEEP the exporter informed of delays that may arise from laboratory examination 4. GO to Step 3: Determine the Sample Size to Inspect on page 2-4-10

- 1 Lead time refers to the amount of time needed to inspect or to examine plants or plant products before their shipping date. Some countries interpret shipping date as the date a commodity physically leaves the exporting country. Advise exporters that they **must** export plants and plant products within the specified time limits following inspection. see [Table 2-4-3 on page 2-4-9](#) for known time limits specified by some countries.
- 2 For information on laboratory accreditation, go to the following web site address: <http://www.aphis.usda.gov/ppq/pim/accreditation/> or see *Special Procedures, Accreditation Programs* on [page 3-1-1](#).

TABLE 2-4-3: Determine Time Limits Between Inspection Date or Issuance Date and Shipping Date (as of May 18, 2004)

If the country is:	Then the maximum time limit:
Austria, Belgium, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Monaco, Netherlands, Poland, Portugal, Romania, San Marino, Slovakia, Slovenia, Spain, Sweden, Switzerland, United Kingdom, Vatican City State	Between the issuance date and shipping date is 14 calendar days
Australia	Between the inspection date and the shipping date is 21 calendar days
Colombia	Between the issuance date and the shipping date is 10 calendar days
Bangladesh, Canada, Honduras, Hong Kong, Israel (propagative articles), Morocco, New Zealand, Norway, or South Africa	Between the inspection date and the shipping date is 14 calendar days
Servia and Montenegro	Between the inspection date and the shipping date is 15 calendar days
Turkey	Between the inspection date and the shipping date is 20 calendar days
Other than listed above	Between the inspection date and the shipping date is 30 calendar days if not otherwise listed in the export summary under the definition for phytosanitary certificate



Important

If the time limit between the inspection date (or issuance date) and the shipping date may be exceeded, then **do not** issue Federal plant export certificates.

Step 3: Determine the Sample Size to Inspect

When determining to conduct a visual inspection, decide whether to inspect the entire shipment or an officially drawn sample. Use [Table 2-4-4 on page 2-4-11](#) to determine the sample size.



Always follow [Safety Precautions for Sampling and Inspecting](#) on [page 2-4-12](#).

Guide whether to inspect the entire shipment or to draw an official sample using the following factors:

- ◆ Directions provided by your supervisor
- ◆ Existing guidelines, such as USDA-APHIS-PPQ import manuals¹ and specific work plans, protocols, or guidelines in EXCERPT, which often mandate sampling schemes for specific commodities
- ◆ Import requirements of the foreign country
- ◆ Knowledge of the pest conditions and pest distribution where the plants or plant products were grown and produced
- ◆ Size of shipment
- ◆ Type of plants or plant products

1 USDA-APHIS-PPQ *Fruits and Vegetables Import Manual, Cut Flowers and Greenery Import Manual, Unprocessed Seeds Import Manual* (computing and drawing samples of seeds packaged in bags and in bulk on pages 4-5 through 4-7 <http://www.aphis.usda.gov/ppq/manuals/pdf_files/40Seeds.pdf>), *Miscellaneous and Processed Products Import Manual, Propagative Seed Manual, MCFR 319.37, Port of Entry Manual*, and *Canadian Border Agricultural Clearance Manual* (sampling and inspection guidelines for shipments of seed packets and hermetically sealed containers in *Procedures, Sampling Seeds* page 5-39 <http://www.aphis.usda.gov/ppq/manuals/pdf_files/CB_Chapters.htm>)

TABLE 2-4-4: Determine Sample Size

If you are going to:	Then:
Inspect 100 percent of the shipment	GO to Step 4: Compare Shipment to Supporting Documents on page 2-4-14
Inspect a representative sample of the shipment	<ol style="list-style-type: none"> 1. DETERMINE the sample size considering the following: <ul style="list-style-type: none"> ◆ Existing guidelines ◆ Experience with similar plants or plant products ◆ Import requirements of the foreign country ◆ Size of shipment ◆ Where the plants or plant products were grown or produced 2. OBSERVE Safety Precautions for Sampling and Inspecting on page 2-4-12 3. DRAW an official sample 4. GO to Step 4: Compare Shipment to Supporting Documents on page 2-4-14
Require an additional sample for laboratory examination	<ol style="list-style-type: none"> 1. DETERMINE the sample size considering the following: <ul style="list-style-type: none"> ◆ Existing guidelines ◆ Experience with similar plants or plant products ◆ Import requirements of the foreign country ◆ Size of shipment ◆ Where the plants or plant products were grown or produced 2. OBSERVE Safety Precautions for Sampling and Inspecting on page 2-4-12 3. DRAW an official sample 4. SEND the official sample to the nearest identifier, public university or public laboratory, or an accredited laboratory as conditions warrant¹ 5. KEEP the exporter informed of delays that may arise from laboratory examination 6. GO to Step 4: Compare Shipment to Supporting Documents on page 2-4-14

1 For information on laboratory accreditation, go to the following web site address: <<http://www.aphis.usda.gov/ppq/pim/accreditation/>> or see *Special Procedures, Accreditation Programs* on **page 3-1-1**.

Officially Drawn Representative Samples

Representative samples of a shipment of plants or plant products **must be** drawn by an ACO or other designated personnel from the following agencies or organizations:

- ◆ Federal, State, or county regulatory officials for all plants or plant products
- ◆ Cooperating agencies such as Federal Grain Inspection Service for grain and grain products or Agricultural Marketing Service for specific commodities
- ◆ Non government entities accredited for seed sampling (see a list in *Special Procedures, Accreditation Programs, Seed Health Accreditation Program* on **page 3-1-3**)

When sampling is the basis for certification, officially drawn samples **must be** large enough to represent the entire lot and **must be** of a nature to accurately reflect the conditions of the entire shipment.

The minimum inspection level for *fruits and vegetables* is 2 percent of the shipment's inspectional unit (i.e., boxes, units, bags, tray packs, etc.).

EXAMPLE	A shipment of 400 boxes of fruits would require 100 percent inspection of 8 boxes (.02 x 400 boxes = 8 boxes). Two percent is a minimal level.
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The inspection level for plant material (*nursery stock*) and other high-risk material should 100 percent or as close to 100 percent as practical. Commodities shipped in bulk (grain or potatoes) will require sampling techniques appropriate to the levels of pest risk and industry standards, which may be less than 2 percent. Consult the appropriate State or Federal regulatory officials for these inspection levels.

Only officially drawn samples may be used to certify seeds.

Officially drawn samples of seeds may include those for weed seed examination, laboratory analysis for pathogens, or insect examination. Samples of seeds drawn by a seed company or other industry representatives are **not** permitted unless the entity is accredited to perform such phytosanitary functions as established by the National Seed Health System and the USDA-APHIS-PPQ Accreditation Manager. See [Special Procedures, Accreditation Programs, Seed Health Accreditation Program](#) on page 3-1-3.

**Safety
Precautions for
Sampling and
Inspecting**

Check the label or description for special instructions regarding exposure. If you are unfamiliar with the pesticide used, attempt to get a pesticide label or description. If the exporter, shipper, or broker **cannot** supply a label or description of the pesticide used, then refuse to sample or inspect, and contact your supervisor.

If while examining *seeds* you notice that they are brightly colored, then assume that they were treated. Regardless of what the label says, blue, orange, and pink colors confirm that seeds have been treated. Also, a powdery residue on seeds indicates they may have been treated.

Keep informed. Safely inspect plant material that have been treated. Potential illness can be prevented. Well-informed regulatory officials are more likely to take precautionary measures in handling treated plant material and contribute to USDA-APHIS-PPQ's excellent safety record. (For additional information on safety, see *Pesticide Safety* in USDA-APHIS-PPQ *Treatment Manual*.)

- ◆ If the material was treated or you feel uncertain, then use plastic gloves and a cartridge type dust mask. If you are continuously working with a dusted commodity, then replace the cartridge every 2 hours. If you are sensitive or allergic to chemicals, use a canister respirator instead of a dust mask
- ◆ If there is the possibility of getting chemicals on your clothes, then you **must** wear protective coveralls. Separately wash the coveralls after each use
- ◆ If there is a possibility of getting pesticide in your eyes, then you **must** wear eye protection
- ◆ Avoid wiping your mouth, nose, or eyes with your hands
- ◆ Wash your hands, face, and arms with soap and water immediately after sampling or inspecting treated material
- ◆ If tools were used in the sampling or examination, then wipe them off after each use
- ◆ If examining treated seeds, then the PPQ pathologist should use the wet method technique for seed examination

Step 4: Compare Shipment to Supporting Documents

Compare the following characteristics of the shipment to the supporting documents:

- ◆ Distinguishing marks and numbers
- ◆ Quantity of plants or plant products
- ◆ Type of plants or plant products

Use [Table 2-4-5](#) to take the appropriate action.

TABLE 2-4-5: Verify That Plants or Plant Products Are as Listed on Supporting Documents

If the plants or plant products:	And after allowing the exporter the opportunity to correct the discrepancies, the exporter:	Then:
Are the same as listed on supporting documents		GO to Step 5: Inspect the Plants or Plant Products on page 2-4-15
Are different than listed on supporting documents (allow the exporter to correct the discrepancies)	Corrects the discrepancies	1. REFUSE to issue a Federal plant export certificate 2. SKIP to Step 9: Record Inspection Results on page 2-4-20
	Does not correct the discrepancies	

Step 5: Inspect the Plants or Plant Products

Inspect the plants or plant products for general pests, those pests usually associated with that host, and those pests specifically listed in the export summary or on the import permit. Use [Table 2-4-6](#) to take the appropriate action.

Seed Shipments

If possible, inspect seeds prior to treatment. Requirements for laboratory testing **must** be met prior to the seeds being treated. *Pelletized seeds cannot* be certified unless the inspection is conducted prior to treatment.



Always follow [Safety Precautions for Sampling and Inspecting](#) on [page 2-4-12](#).

Look for insects, weed seeds, ergot, etc.

Seeds **cannot** be certified based **only** on the fact that the seeds have been treated and/or vacuum packed. Appropriate seed sampling and inspection **must** always be conducted.²



Do not certify pelletized seeds unless they were inspected prior to treatment.

Phytosanitary Note #0965, dated 07/07/2004 is a special note clarifying APHIS' policy concerning the phytosanitary certification of seeds. Phytosanitary Note #803, dated 05/18/95, states APHIS' policy concerning certifying grain for freedom from disease-causing organisms.

TABLE 2-4-6: Action to Take Based on Inspection Results

If pests or diseases are:	Then:
Present	<ol style="list-style-type: none"> 1. If you anticipate a delay that will allow for the identification and/or reconditioning of the shipment, then INFORM the exporter of the infestation and/or infection 2. GO to Step 6: Obtain Pest Identity on page 2-4-16
Absent	GO to Step 8: Look for Unauthorized Packing Material on page 2-4-19

² See USDA-APHIS-PPQ *Canadian Border Agricultural Clearance Manual* for guidelines on sampling and inspecting shipments of seed packets and hermetically sealed containers located at the following web site address: <<http://www.aphis.usda.gov/ppq/manuals>>.

Step 6: Obtain Pest Identity

Obtain the identity of the intercepted plant pest. Use [Table 2-4-7](#) to take the appropriate action.

TABLE 2-4-7: Action to Take to Identify the Intercepted Plant Pests

If you are a:	And you:	Then:
PPQ officer	Have identification authority for the intercepted plant pest	GO to Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest on page 2-4-17
	Cannot identify the intercepted plant pest, or you lack identification authority	<ol style="list-style-type: none"> 1. COMPLETE PPQ Form 309 or PPQ Form 309a 2. SEND the specimen along with the form to the nearest PPQ identifier 3. If applicable, INFORM the exporter of the delay 4. GO to Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest on page 2-4-17
State or county cooperator	Have identification authority for the intercepted plant pest	GO to Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest on page 2-4-17
	Cannot identify the intercepted plant pest, or you lack identification authority	<ol style="list-style-type: none"> 1. SEND the specimen to the nearest State or Federal identifier 2. If applicable, INFORM the exporter of the delay 3. GO to Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest on page 2-4-17

Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest

After the intercepted plant pest is identified, check the export summary and/or the import permit to determine whether the plant pest is either of the following:

- ◆ Quarantine significant to the foreign country
- ◆ Recognized as being an injurious plant pest

ACOs **must** comply with the certification statement on the PPQ Form 577, which is as follows:

This is to certify that the plants, plant product or other regulated articles described herein have been inspected and/or tested according to appropriate official procedures and are considered to be free from quarantine pests, specified by the importing contracting party and to conform with the current phytosanitary requirements of the importing contracting party including those for regulated non-quarantine pests.

APHIS' policy is to inspect and to certify shipments that are practically free³ from other injurious pests.

Use [Table 2-4-8 on page 2-4-18](#) and [Table 2-4-9 on page 2-4-18](#) to take the appropriate action.

3 For export certification purposes, the working definition of practically free is to **not** exceed a 2 percent infestation level unless otherwise stated by the importing country. Practically free also refers to a judgement that the plant pests are **not** in excess of the amount expected to result from, and be consistent with, good culturing and handling practices employed in the production and marketing of the commodity. When FGIS inspection certificates are used as supporting documentation for certifying grain, practically free refers to FGIS' acceptance standards for weevils found in grain.

TABLE 2-4-8: Action to Take When Plants and Plant Products Are Found Infested or Infected

If the identified plant pest is:	And is considered to be:	And the infestation level:	Then:
Listed in the export summary of the foreign country as being quarantine significant		→	GO to Table 2-4-9
Not listed in the export summary as being quarantine significant	Injurious to the plants or plant products	Is considered practically free ¹	GO to Step 8: Look for Unauthorized Packing Material on page 2-4-19
		Cannot be considered as practically free ¹	GO to Table 2-4-9
	Not injurious to the plants or plant products	→	GO to Step 8: Look for Unauthorized Packing Material on page 2-4-19

1 For export certification purposes, the working definition of practically free is to **not** exceed a 2 percent infestation level unless otherwise stated by the importing country. Practically free also refers to a judgement that the plant pests are **not** in excess of the amount expected to result from, and be consistent with good culturing and handling practices employed in the production and marketing of the commodity. When FGIS inspection certificates are used as supporting documentation for certifying grain, practically free refers to FGIS' acceptance standards for weevils found in grain.

TABLE 2-4-9: Action to Take When the Plant Pest Is Quarantine Significant or the Infestation Exceeds the Practically Free Condition

If a treatment is:	Then:
Available for the plant pest and acceptable by the foreign country as a condition of entry	1. ALLOW the exporter to treat the plants or plant products 2. MONITOR the treatment <div style="display: flex; align-items: center; margin: 10px 0;">  <div style="border: 1px solid black; background-color: #e0f2f1; padding: 5px; font-size: small;"> Make no mention of the infestation or infection on the Federal plant export certificate; only RECORD the treatment in the appropriate section. </div> </div> 3. GO to Step 8: Look for Unauthorized Packing Material on page 2-4-19
Unavailable for the plant pest	1. REFUSE to issue a Federal plant export certificate 2. SKIP to Step 9: Record Inspection Results on page 2-4-20
Unacceptable to the foreign country as a condition of entry	

Step 8: Look for Unauthorized Packing Material

If you have **not** done so, then look in the export summary for **unauthorized** packing material, bagging, containers, and soil or specific requirements for packing material and growing media.

Use **Table 2-4-10** to determine the regulatory action to take on shipments contaminated with soil or with unauthorized packing material, bagging, or containers.

TABLE 2-4-10: Regulate Plants or Plant Products With Unauthorized Packing Material, Bagging, Containers, or Growing Media

If the shipment is:	And the exporter:	Then:
Free from soil and unauthorized packing material, bagging, or containers		GO to Step 9: Record Inspection Results on page 2-4-20
Contaminated with soil or with unauthorized packing material, bagging, or containers	Cleans, treats, and/or reconditions shipment Refuses to clean, treat, or recondition shipment	

Step 9: Record Inspection Results

ACOs **must** record results of their inspection and additional information about the shipment that will support their decision to certify the plants or plant products. Inspection results may be recorded at the bottom of PPQ Form 572; on the reverse side of PPQ Form 577, Issuing Office Copy; or on the reverse side of PPQ Form 579, Issuing Office Copy. See [Table 2-4-11 on page 2-4-21](#).

ACOs **must** record the following information about the inspection:

1. Place (port and location) where the plants or plant products were inspected.
2. Percentage (how much) of material inspected.
3. Percentage of material infested or infected.
4. Pests intercepted and treatments given.
5. Actions taken by the exporter (as a result of inspection) making the plants or plant products eligible for certification such as repackaging, reconditioning, or debarking.
6. Unusual situations concerning the shipment.
7. ACO signature.
8. Date and time of the inspection (ensure that the inspection was conducted within specified time limits).

TABLE 2-4-11: Record Inspection Results

If you are recording inspection results on:	Then:
PPQ Form 572, Application for Certification	1. RECORD the inspection results under Export Inspection Data as follows: <ul style="list-style-type: none"> ◆ LIST in <i>Block 12</i>, place (port and location) where the plants or plant products were inspected ◆ LIST in <i>Block 13</i>, percentage (how much) of material inspected ◆ LIST in <i>Block 14</i>, percentage of material infested or infected ◆ LIST in <i>Block 15</i>, pests intercepted and treatments given, actions taken by the exporter and ACO (as a result of the inspection) to make the plants or plant products eligible for certification (such as repackaging, reconditioning, debarking, intended use, notation of additional declaration, official verification, pest or disease freedom, presence or absence of import permit, foreign phytosanitary certificate, or other import requirements and unusual situations concerning the shipment) ◆ SIGN your name in <i>Block 16</i> ◆ LIST in <i>Block 17</i>, date and time of inspection 2. ATTACH PPQ Form 572 to the Issuing Office Copy of PPQ Form 577 or PPQ Form 579, if applicable 3. GO to Step 10: Prepare a Federal Plant Export Certificate on page 2-4-22 , if applicable
PPQ Form 577, Federal Phytosanitary Certificate	1. RECORD the inspection results on the reverse side of the Issuing Office Copy as follows: <ul style="list-style-type: none"> ◆ LIST in <i>Block 1</i>, place (port and location) where the plants or plant products were inspected ◆ LIST in <i>Block 2</i>, percentage (how much) of material inspected ◆ LIST in <i>Block 3</i>, percentage of material infested or infected ◆ LIST in <i>Block 4</i>, pests intercepted and treatments given, actions taken by the exporter and ACO (as a result of inspection) to make the plants or plant products eligible for certification (such as repackaging, reconditioning, debarking, intended use, notation of additional declaration, official verification, pest or disease freedom, presence or absence of import permit, foreign phytosanitary certificate, or other import requirements and unusual situations concerning the shipment) ◆ SIGN your name in <i>Block 5</i> ◆ LIST in <i>Block 6</i>, date and time of inspection
PPQ Form 579, Phytosanitary Certificate for Reexport	2. GO to Step 10: Prepare a Federal Plant Export Certificate on page 2-4-22 , if applicable

Step 10: Prepare a Federal Plant Export Certificate

After recording the inspection results and deciding to issue a Federal plant export certificate, then proceed to preparing and distributing the proper Federal plant export certificate. Use [Table 2-4-12](#) to determine the action to take based on the inspection results.

TABLE 2-4-12: Action to Take Based on Inspection Results

If the plants or plant products:	And you are a:	And the plants or plant products are:	Then:
Met the import requirements based on supporting documents and inspection results	PPQ Officer	Unprocessed, domestic origin	1. COLLECT a user fee or RECORD a prepaid PPQ Form 577 (see <i>Special Procedures, User Fees</i> on page 3-11-1) 2. GO to <i>Procedures, Export Certificates, PPQ Form 577, Federal Phytosanitary Certificate</i> on page 2-5-15
		Noncommercial shipment of unprocessed foreign origin	GO to <i>Procedures, Export Certificates, PPQ Form 579, Phytosanitary Certificate for Reexport</i> on page 2-5-40
		Commercial shipment of unprocessed foreign origin	1. COLLECT a user fee or RECORD a prepaid PPQ Form 579 (see <i>Special Procedures, User Fees</i> on page 3-11-1) 2. GO to <i>Procedures, Export Certificates, PPQ Form 579, Phytosanitary Certificate for Reexport</i> on page 2-5-40
	State or county cooperator	Unprocessed domestic origin	1. If applicable, then SEE your local policy for collecting user fees 2. GO to <i>Procedures, Export Certificates, PPQ Form 577, Federal Phytosanitary Certificate</i> on page 2-5-15
Do not meet the import requirements based on inspection results		Unprocessed foreign origin	1. If applicable, then SEE your local policy for collecting user fees 2. GO to <i>Procedures, Export Certificates, PPQ Form 579, Phytosanitary Certificate for Reexport</i> on page 2-5-40
			REFUSE to issue a Federal plant export certificate