

*February 2001*

## **Safeguarding-The First Year**

### **Why Safeguarding; Why Now?**

As the national plant health protection organization in the United States, the Animal and Plant Health Inspection Services' (APHIS) Plant Protection and Quarantine (PPQ) program has been faced with numerous challenges and undergone many stresses in recent years. Our world has become a much closer place with people and goods moving greater distances more rapidly each year. The way goods are shipped has also changed, with an increasing reliance on containerization and the rapid transfer of containers from the port of entry to interior transport and distribution systems. Even the types of goods moving and the nature of the associated risk has changed. Packing material, for example, poses a much higher risk than was previously known, and smuggling of niche products such as exotic fruits and meats has grown to accommodate the demands of a society that thrives on exposure to many cultures.

All of these factors created stress on our safeguarding system—a continuum of activities that includes the collection and use of international pest information; the use of permits to manage risk; exclusion of pests; and detection of and response to pests that enter the United States. What have been the symptoms of stress? Outbreaks such as plum pox, citrus canker, Asian longhorned beetle, and Karnal bunt are but a few. They represent breaches in our system that have been very costly to producers, consumers, and taxpayers, and they have affected our natural resources. Our program has had to evolve and must continue to evolve to address and overcome these stresses.

Historically, our effort to keep pests from becoming established in the United States relied almost entirely on port-of-entry inspections of commodities and passenger baggage. This approach has its value, but it cannot address all the risk that's out there—no one single approach can. During the 1970's and 1980's, concern about the rapid growth in travel and trade led to a number of reviews of PPQ's programs. These reviews contained recommendations to strengthen exclusion of pests by, for example, strengthening the science base of the program, and preclearing goods in the country of origin. Many of these recommendations were implemented successfully, some were not, and others, such as preclearance programs, were implemented but were quickly overwhelmed.

Change occurred and the program evolved, but it evolved slowly. A significant milestone in this evolution was reached when PPQ's top management officials met in 1996 to discuss how to properly define our activities in a global environment and during a time of government deficit reduction. Rather than viewing the primary role of PPQ as exclusion or "protection through inspection," the group embraced the concept of PPQ operating along a safeguarding continuum. The group stated:

"PPQ is currently involved in a number of activities necessary to protect the health of U.S. plant and animal resources, such as preclearance inspection, permit decisions, port of entry inspection, quarantine treatment, detection, survey, and eradication of exotic plant pests. While these activities are fundamental to protecting U.S. plant and animal resources, they only achieve maximum effect when integrated into a comprehensive safeguarding system to reduce pest risk to an acceptable level."

Issues outlined in the management team's concept paper included the need to base the overall safeguarding system on risk; develop and maintain pest response capacity; ensure that pest interventions are based on the best available science; and be more effective in gathering and using information available throughout the world.

## **The Review**

The PPQ management team's effort to redefine and refocus the program's guiding philosophy laid the groundwork for the Safeguarding Review. The review was put together under a cooperative agreement between PPQ and State counterparts at the National Plant Board (NPB). The 43-member Review Group included representatives of States, industry, academia, and advocacy groups. A PPQ Steering Committee defined the parameters of the review; provided background information and access to employees, sites, and records; and ensured that the group stayed focused on meeting the program's needs. The group was asked to address the four primary components of the safeguarding system—permits, international pest information, exclusion, and detection and response. In carrying out the review, they looked at what was working, what wasn't working, and what could be done to strengthen the system. The Review was designed to elicit recommendations to address clearly-defined problems. It was designed to bring a balanced perspective to the myriad problems we face by including the views of employees, industry, States, academia, and environmental groups. It was designed to be objective.

The Safeguarding Review Report, *Safeguarding America's Plant Resources*, was delivered to the Department in July 1999 with high expectations among our stakeholders and within the program for its implementation. We immediately put a structure in place to evaluate the recommendations in the Review and develop action plans to implement any recommendation that was practical and that would contribute to the mission of safeguarding. The action plans are put through a full vetting process, first among informal peer review groups, then through the PPQ Steering Committee. After they have been reviewed by the Steering Committee, the action plans go to PPQ's top management for review, then the plan is posted on the safeguarding website, [www.safeguarding.org](http://www.safeguarding.org), where internal and external stakeholders have 2 weeks to comment on the plans. When the comment period is over, the plans are turned over to program personnel for implementation.

The review contained more than 300 recommendations. Action plans covering about 200 recommendations have been submitted to the Steering Committee for review. Action plans covering 85 recommendations have been through the entire process and have been turned over to the program for final implementation. The rest are either in review or undergoing final revision management review. We have made substantial progress toward implementing the recommendations in the Safeguarding Review in the year since implementation began in earnest.

### **Accomplishments**

But numbers alone are not results. The question we must ask is what has changed in PPQ? How do we define and measure success? Indeed, what does change mean? Dean Acheson once said "If we learn the art of yielding what must be yielded to the changing present we can save the best of the past." PPQ has a long and proud history, punctuated by many successes. As we work to strengthen our organization through change, we must not lose the strengths that are rooted in our history. Change is sometimes revolutionary, but more often, it is evolutionary. That is the type of change we are now engaged in. It is incremental and can be difficult to measure. Its effects may be felt immediately or may take several years to ripple through the organization, but change is inevitable. When it does occur, it is most often the result of multiple forces—economic, sociological, scientific, technical, and political. The Safeguarding Review is both a force for change and a reflection of the multiple forces at play in the larger world that created the need for change. Some of the Review's recommendations reflect activities that were already planned or underway, while others represent completely new approaches. All of them are focused on strengthening the plant health safeguarding system. Some examples of our progress with carrying out specific recommendations follow.

### *Foundational Accomplishments: Authorities, Funding & Leadership*

- One of the foundations for guiding the future of PPQ is a reassessment of the program's mission and vision and development of the values needed within our workforce to carry out the mission and vision. We recently distributed the third and final draft of PPQ's mission, vision, and values for comment by the PPQ workforce. A strategy for communicating the new mission, vision, and values and aligning the organization with them through the program's strategic planning process is currently being developed.
- The Plant Protection Act (PPA), a 17-year effort to streamline, consolidate, and modernize 10 plant quarantine laws was enacted. Clearly, this was underway when the review was developed. However, the Review Group thought enactment of the PPA was an important foundation upon which further change could be built. The synergy created by the Safeguarding Review process helped further coalesce a coalition of State and industry groups that already supported the legislation, resulting in its ultimate passage.
- The Review Group recommended increasing user fee collections and using the increase to support an expanded capacity for exclusion. We must be mindful that the legal authority for user fees limits the application of fees to the purposes for which they are collected, namely, exclusion activities. However, they can also be used for activities that directly or indirectly support the primary purpose. The user fee has been increased and the increased revenues have been applied to activities supported by the Safeguarding Review, such as smuggling interdiction, increased risk assessment capacity, and strengthening the science base of the program.
- The Executive Order on Invasive Species was being developed concurrently with the Safeguarding Review. Our stakeholders urged us to take a leadership role in any activities contemplated under the Order. We have done so by being full participants in the development of the Invasive Species Management Plan, which reflects the many ways PPQ can and does address invasive species issues. Our stakeholders also wanted to ensure that the agriculture community was fully represented on the advisory committee established under the Order. In response, we submitted an extensive list of candidates, and many of them were named to the committee.
- PPQ was also urged to exercise leadership in the international arena. To this end, we have worked toward acceptance of the revised text for the International Plant Protection Convention (IPPC). The IPPC is the international body that sets phytosanitary standards in support of international agreements such as the World Trade Organization's agreement on sanitary and phytosanitary issues. PPQ's strong presence in this organization, allows us to help ensure a good scientific foundation for any actions that prohibit or restrict the movement of agricultural goods. The recent revisions to the IPPC will keep standard-setting focused on science and on allowing each country to establish an appropriate level of protection without imposing artificial barriers to trade and commerce.

### *Program Administration, Investigations & Enforcement*

- The smuggling interdiction and trade compliance (SITC) program evolved from separate efforts in Florida and California. This integrated approach to investigation, information sharing, and interdiction was so successful that the Review recommended expansion to a coordinated national program. We have formalized the SITC program structure and are recruiting positions nationwide. Policies and operational procedures have been developed, and there have been a significant number of successful interdictions. The program has also worked with importers and distributors to increase compliance. Future activities will support offshore mitigation efforts by reaching out to shippers overseas and educating them about import requirements.
- With the passage of the PPA, our civil penalty authority increased from \$1,000 per violation to a maximum of \$50,000 per violation for individuals and \$250,000 for companies and other entities. A special task force is now developing guidelines for penalties; developing strategies for alternative penalties; identifying training and information needs; and integrating information on the issuance of penalties into PIN-Ops and any other appropriate database. The work ahead is complex, and should be completed by December 2001. The group will release products for application in PPQ programs as each product is approved.
- The Safeguarding Review recommended that we increase the number of detector dog teams and place them at all high-risk ports of entry. The National Detector Dog Training Center is now structured to accomplish these recommendations by deploying 50 additional detector dog teams within the next year. The regional canine program managers will continue to evaluate ports that would be good candidates for future placement of detector dog teams or other risk mitigation measures. In addition, we have begun examining breed selection to ensure the most appropriate use of dogs for different purposes. For example, we have begun using larger breeds of dog along the Mexican border to work vehicle inspections.
- Many goods transit the United States for shipment elsewhere or go from the port of entry to an inland site from which they are distributed throughout the United States. There is concern about our policies and our capacity to effectively monitor these shipments. Transit guidelines have been developed for certain types of transit shipments and we are looking at what needs to be done through the rulemaking process to strengthen our monitoring of different types of transit shipments. In addition, we are looking at all of the complexities surrounding the establishment and permanent staffing of inland inspection sites.

## *Analysis & Technology*

- The backlog in risk assessments for imported commodities and a perceived lack of transparency in our risk assessment and rulemaking processes has been problematic for our stakeholders. We have begun to build our capacity for conducting both commodity and pathway risk assessments, and we are developing pest lists and other information to support improved analysis. We are actively developing a stakeholder registry so we can identify and better communicate with stakeholders concerning our regulatory and policy decisions. Soon, we will be publishing a notice for comment that outlines the processes we will use for prioritizing and conducting risk assessments.
- The permit issuance system is being transformed from a cumbersome and time-consuming paper process to a computer-driven process. An on-line process for fruit and vegetable permits is already being piloted and there is more to come. This will decrease the time for issuance of permits, allow for easier tracking of the status of a permit, and improve stakeholder access to information about permits and the permit system.
- A critical need to support safeguarding is the enhancement of existing tools and development of new technologies for pest detection and mitigation. We have filled the longstanding vacancy for the Director of the Center for Plant Health Science and Technology (CPHST) with a scientist who is world-renowned and has a proven record of leadership. We have also established five national science program leader positions. The program leaders will link CPHST activities with the larger scientific community and leverage ongoing research outside of PPQ. They will also reestablish and strengthen the linkages between research activities and the operational needs of PPQ.
- Information Technology (IT) problems have been a significant barrier. One of the first actions taken on the basis of the Safeguarding Review was to put in place a staff to address the IT needs of the program. The Director of this staff is working closely with the IT community in APHIS in future planning efforts and she has developed a comprehensive multi-year strategy for providing an improved IT infrastructure, ensuring round-the-clock service of IT, and providing a fully integrated network for data-sharing and analysis.
- Another technology that is helping us be more effective and responsive is digital imaging. We have now installed this technology at all major ports and we are looking at expanding the placement of digital imaging technology to additional ports. Our network of identifiers and external experts will be fully connected so we can rapidly identify and act on intercepted pests.

### *Communications & Partnerships*

- The Review recognized the benefits of supporting program activities with strong education and outreach programs to increase awareness of and compliance with our regulations and acceptance of our program activities. A comprehensive multi-year marketing strategy has been developed and will be implemented by the Legislative and Public Affairs staff on behalf of PPQ.

### *Employee Development & Utilization*

- The Safeguarding Review recommended the establishment of an environment that supports continual learning. Our Professional Development Center has developed and is implementing a comprehensive training plan to be supported by individual learning contracts. The infrastructure of the Center is also being strengthened.

### **Summary**

The examples outlined above are but a few examples of the progress we are making. Many more recommendations are still in the process of being implemented—improvements in our identification capacity, evaluation and improvement of our internal communications channels, evaluation and improvement of x-ray technologies, and expansion of the border cargo release program, for example. It may take years to determine the true impact of the Safeguarding Review on our organization. We are working to link the safeguarding initiatives closely with our strategic planning process, which, in turn, supports our long-range planning and annual budget development process. We have also begun to develop more formal systems for identifying and measuring our progress with implementation. Some of you are already seeing changes in your areas of work, and there is more to come. If our efforts are successful, these changes will result in better alignment of our activities with risk; a stronger, more integrated safeguarding system; and a work environment that provides the opportunity for productivity and growth.