Compliance Agreements to Mitigate Quarantine Pests Detected at Port of Entry

William E. Thomas
Director of Preclearance and Offshore Programs,
Plant Protection and Quarantine
Uses Of Grains

- Grains arriving in the United States have many uses
- The end use determines how to mitigate pests
- Grain pests can often be mitigated by the normal processing that the product receives
Compliance Agreements

- Document signed by the importer /processor and USDA
- Outlines the specific mitigation measures the company must do to the product
- Outlines the oversight USDA will provide
Mitigation Methods

- Grinding
- Cleaning
- Heat treatments
- Pesticide treatments
- Combinations
Example of Mitigation Measure

Direct Steam Injection in PETFOOD PROCESSING APPLICATIONS

1. Ground Meat/By-product Heating and Mixing
2. Raw Materials Heating and Mixing (Cereals/Grains, Vitamins/Minerals)
3. Dye/Color Injection System
4. Exuders
5. In-line Flavor Injection System
6. Conveyer Cleaning/Spray Bar
7. Sanitation/Canning Process
8. Digester/Waste Treatment
9. Central Hot Water System

Pre-Process Flavoring Plant:
1) LAD (Liquid Animal Digest)
   1. Skim milk is heated to 200°F and held for 10 seconds with enzymes
2) Dryer
   2. Heated to 170°F for 40 seconds and then sent to the homogenizer
3) FINES Process
   3. Heated waste particulate which is screened and put back into the mix and heated to 200°F for 90 seconds with enzymes.

These are all time and temperature applications which eventually turns this into a USP approved powder used in the coloring and flavoring of dry food at scale plants.
Parameters for Compliance Agreement

- Availability of USDA inspectors
- Proximity of the place of processing to USDA inspectors
- Agreement by the company to USDA presence
- Willingness to comply with the written agreement
- May be one time only or stay established for future shipments
USDA oversight

- Could be complete supervision of the processing
- Usually spot checks
- Record keeping by the processing company
Advantages and Disadvantages

- Least restrictive action
- Allows product to move into commerce while assuring it is pest free
- Transit of the product can increase risk
- Labor intensive
Weed Seeds and Regulated Seeds

- Grinding
- Heat treatment or pelletization
- Cleaning
- Can result in regulatory changes
Conclusions

- Good for trade
- Allows for least restrictive action
- Mitigates pests effectively
- Usually does not require more complex processing than is already occurring
- Usually less expensive than reexport
Contact Information

- William.E.Thomas@aphis.usda.gov
- 301-734-8295

- George.Galasso@aphis.usda.gov
- 301-734-0857