



Canadian Food Inspection Agency Agence canadienne d'inspection des aliments

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Canadian Food Inspection Agency



Our vision:
To excel as a science-based regulator, trusted and respected by Canadians and the international community.

Our mission:
Dedicated to safeguarding food, animals and plants, which advances the health and well-being of Canada's people, environment and economy.

Grain Import Framework: Invasive Pests in the Grains Pathway

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Plant Health and Biosecurity Directorate
Canadian Food Inspection Agency



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Objective

- To provide an overview of the Canadian Food Inspection Agency's (CFIA) proposed regulatory approach to protecting Canada's agricultural resource base by preventing entry of invasive pests via the grain pathway.
- To highlight efforts being made to accommodate the unique trade relationship with the continental United States.
- To protect Canadian agricultural interests while providing options to minimize trade impacts.



Background

- The CFIA is Canada's National Plant Protection Organization (NPPO) of the International Plant Protection Convention (IPPC)
- The CFIA administers the *Plant Protection Act* : preventing the importation, exportation and spread of pests.
- The CFIA is committed to developing an Invasive Plants Program under broader *Invasive Alien Species Strategy for Canada*
 - Risk analysis completed, Invasive Plants Policy finalized
 - Invasive plants, like other regulated pests, e.g., diseases and insects, present significant economic risk to Canada through their unimpeded entry.
 - Potential increase in production costs (increase input costs)
 - Potential reduction in yields
 - Introduction of noxious weeds or loss of pasture land
 - Comparative trade advantage and potential loss of access to key markets

Prevention is key

Rationale for import requirements

- **Risks are increasing**
 - Trend is towards more international attention to pests
- **Protecting market access**
 - Robust import framework protects favourable plant health status leading to better market access
- **International environment is competitive**
 - Being able to demonstrate pest freedom or limited distribution is often a key negotiating point with trading partners.
 - Many countries, including the U.S., regulate khapra beetle on imports
 - Mexico, India, United States, China, Russia regulate weed seeds on imports
- **Greater volume and diversity in grain imports (commodities and origins)**
 - Pest interceptions by the CFIA are on the rise.



Impacts of Invasive Plants

- Approximately 11% of crop losses in North America per year are a result of invasive plants which costs the agricultural industry in excess of \$2 billion/yr.
- Approximately 80% of Canadian agricultural pesticide expenditures are on herbicides to control weeds, of which over 75% of which are alien species.
- It is estimated that season-long competition from uncontrolled grass weeds, such as woolly cupgrass, can reduce corn yields by up to 50%.



Woolly cupgrass (*Eriochloa villosa*)

- Reported to be tolerant of many commonly used herbicides.
- Germinates throughout the season so difficult to control.
- Regulated under *Plant Protection Act* and listed as a prohibited noxious weed on the *Weed Seeds Order*.



Khapra Beetle (*Trogoderma granarium*)

- On Canada's List of Regulated Pests (regulated since 1968)
- Regulated by the United States on imports (e.g. rice, soybeans, chickpeas, safflower)
- Increased diversity and volume of trade from khapra beetle infested countries



Current Phytosanitary Requirements

Policy and Commodity	Origin	Current Requirements
D-99-01 : Wheat, Barley, Oats, Rye and triticale (seed and grain)	non-U.S.	Phytosanitary Certificate AND Import Permit
	U.S.	Phytosanitary Certificate ⁽¹⁾
Other agricultural grain	All	No phytosanitary documentation ⁽²⁾
Other agricultural seed	All	Crop kind specific ⁽³⁾
D-96-07: screenings, or grain or seed for cleaning in Canada	non-U.S.	Prohibited
	U.S.	Import Permit

(1) A pilot program with North Dakota and Montana to allow a Certificate of Origin and Import permit for those areas in these states which are recognized as being free of regulated pathogens.

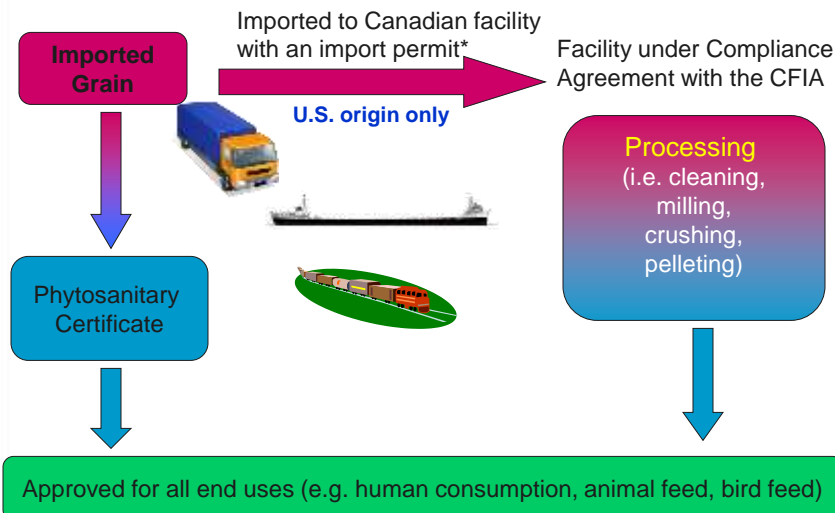
(2) Imports may be subject to inspection for quarantine pests

(3) Weeds regulated under the *Seeds Act*; Soybean and corn seed have phytosanitary requirements

Proposed Approach

- Recognizing regional risks and trading patterns
 - The U.S. is Canada's largest trading partner for grains, therefore end-use categorization being proposed
 - Non-U.S. imports: end use categorization is not an option (keep risk off-shore)
- Regulating based on categorizing commodities according to the pest risk of the intended end use
 - **Lower risk:** end uses that involve steps that act to mitigate phytosanitary risk (e.g., crushing, milling or other devitalisation processes)
 - **Higher risk:** end uses where no risk mitigating step is involved (e.g., direct consumption of grain by livestock)
- Options for Importers
 - Phytosanitary certificate indicating freedom from key pests.
 - CFIA import permit followed by cleaning and disposal mitigation measures.
 - Commodities with high level processing imported with CFIA import permit.

Phytosanitary Import Requirements under D-12-04 (non-U.S. origin grain) and D-12-05 (U.S. origin grain)



* Import permit valid for a year, multiple consignments and can be issued for multiple commodities. A compliance agreement may be required if screenings are generated from the imported material.
 ** Phytosanitary certificate required on each consignment

Proposed Requirements

Policy and Commodity	Origin	Proposed Requirements	
		Post-Entry Risk Mitigation	No Post-Entry Risk Mitigation
D-99-01 : wheat, barley, oats, rye and triticale (seed and grain)	non-U.S.	n/a*	Phytosanitary Certificate AND Import Permit
	U.S.	Import Permit	Phytosanitary Certificate
Draft D-12-04 : other agricultural grain	non-U.S.	n/a*	Phytosanitary Certificate
Draft D-12-05: other agricultural grain	U.S.	Import Permit	Phytosanitary Certificate
Draft D-12-06: other agricultural seed	All	under development	under development

Imports may be subject to inspection
 * Non-U.S. imports require mitigation at origin.

Consultations

- Over last three years, domestically and internationally
 - All major Canadian and U.S. growers and industry associations, provincial and state agricultural departments, WTO, IPPC contact points
- Key milestones
 - **Consultations on new import directives:** of grain from continental US and offshore distributed to over 2,500 stakeholders (Sept - Oct 2012)
 - **Science-based risk analysis:** completed on potential plant species (2009-2010)
 - **Policy Consultation:** Invasive Plants Policy and the regulation of selected invasive plants with Canadian stakeholders (June-Oct 2010)
 - **Policy Approval:** Invasive Plants Policy (Feb 2012)
 - **Updated *List of Regulated Pests*:** Woolly cup grass added (Apr. 2012)
 - **Trading partners notification through WTO-SPS**
 - Canada's intent to require certification for WCG and Khapra beetle (May 2012)
 - Canada's intent to regulate 15 additional invasive plant species (Aug 2012)

Key Stakeholder Issues Under Consideration

- Lack of clarity on scope and requirements
 - Which commodities will be regulated (i.e., seed vs. grain)?
 - What requirements apply to a commodity (i.e., exempt or certified?)
 - What is the actual risk of introduction of a weed species through a specific crop kind for a specific end-use?
- Concern of increased certification (e.g., phytosanitary certificates) on previously unregulated commodities
 - Increased costs and delays in obtaining certification as a result of additional sampling and testing requirements in country of export
- Concern on timelines and ability to implement
 - Consultation period too short given range of stakeholders implicated
 - Implementation impacts not fully understood: USDA & stakeholders

Next Steps

- Further analysis of Canada-US grain trade
 - Volume patterns and handling/processing methods through joint study by AAFC, the Canada-US Industry Grain Task Force, USDA-APHIS, CFIA
- Continue refinement of commodity and end-use specific risk analyses. (e.g., evaluate risk of field-run corn grain imported into Canada, farmer to farmer grain movement)
- Engage closely with USDA on any remaining concerns (e.g., implementation, trade considerations)
- Enhanced outreach with domestic stakeholders
 - Clarify risks and policy requirements
 - Solicitation of certification alternatives
 - National Grain Biosecurity Symposium (March 19, 2013)

Questions?

For further information

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