

3

Export Program
Manual

General Procedures

Inspecting Commodities

Contents

Introduction	page 3-5-1
General Inspection Guidelines	page 3-5-2
Determine if the Exporter Has Acceptable Documentation That Would Preclude an Additional Inspection	page 3-5-3
Determine Lead Time and Time Limits	page 3-5-4
Determine the Sample Size	page 3-5-5
Officially Drawn Representative Samples	page 3-5-5
Two Percent Level	page 3-5-6
Hypergeometric Table (95% confidence level)	page 3-5-6
Safety Precautions for Sampling and Inspecting	page 3-5-9
Compare Shipment to Supporting Documents	page 3-5-10
Inspect the Commodity	page 3-5-11
Seed Shipments	page 3-5-11
Obtain Pest Identity	page 3-5-12
Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest	page 3-5-13
Look for Packaging or Other Material	page 3-5-15
Record Inspection Results	page 3-5-16
Prepare an Export Certificate	page 3-5-18

Introduction

This section covers the general inspection guidelines that Authorized Certification Officials (ACOs) should follow when sampling, inspecting, and verifying eligible commodities offered for export certification. For procedures to inspect specific commodities, refer to special procedures included in Chapter 4 of this manual.



Items listed in EXCERPT as processed products eligible **only** for PPQ Form 578 are believed to be free of injurious plant pests. Therefore, the steps beginning on page 3-5-2 **do not** apply to these processed products. Refer to the processed products menu in EXCERPT to identify eligible processed products.

General Inspection Guidelines

Inspections **cannot** begin until these actions have been taken:

- ◆ You have reviewed the export summary and identified import requirements
- ◆ Exporter has given you a copy of a mandatory import permit (IP), with translation, if appropriate
- ◆ Exporter has presented the entire consignment all together, clearly marked and labeled

Go to **Figure 3-5-1** on **page-3-5-2** for a list of the main inspection steps followed by detailed guidelines.

“Step 1: Determine if the Exporter Has Acceptable Documentation That Would Preclude an Additional Inspection” on **page-3-5-3**

“Step 2: Determine Lead Time and Time Limits” on **page-3-5-4**

“Step 3: Determine the Sample Size” on **page-3-5-5**

“Step 4: Compare Shipment to Supporting Documents” on **page-3-5-10**

“Step 5: Inspect the Commodity” on **page-3-5-11**

“Step 6: Obtain Pest Identity” on **page-3-5-12**

“Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest”
on **page-3-5-13**

“Step 8: Look for Packaging or Other Material” on **page-3-5-15**

“Step 9: Record Inspection Results” on **page-3-5-16**

“Step 10: Prepare an Export Certificate” on **page-3-5-18**

FIGURE 3-5-1: Overview of General Inspection Guidelines

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

PPQ, through accreditation programs, compliance agreements, Memorandums of Understanding (MOUs) and other special programs cooperates with other Federal agencies, State and county governments, and nongovernmental entities to conduct various phytosanitary laboratory tests, inspections, etc. for specific commodities. If presented with documentation, go to [Appendix A](#) for a list of acceptable inspection certificates and documentation. Use [Table 3-5-1](#) on [page-3-5-3](#) to take the appropriate action.

TABLE 3-5-1: Determine If the Consignment Has Acceptable Documentation

If the consignment:	Then:
Has acceptable documentation	GO to <i>“Step 2: Determine Lead Time and Time Limits”</i> on page-3-5-4
Lacks acceptable documentation	<ol style="list-style-type: none"> 1. REFUSE to issue an export certificate or, if applicable, proceed to conduct a visual inspection 2. GO to <i>“Step 2: Determine Lead Time and Time Limits”</i> on page-3-5-4

Step 2: Determine Lead Time and Time Limits

Lead time refers to the amount of time needed to inspect or to examine commodities before their shipping date.

Determine if there is enough lead time to conduct any required phytosanitary actions and if time limits can or have been met. Time limits **must** be met regardless of whether an ACO or another authorized entity performs the phytosanitary inspection, testing, etc.

Check the shipping date to ensure there is enough lead time for a laboratory examination/test and to plan for visual inspections in order to meet any time limit specified by the foreign country.

TABLE 3-5-2: Decide to Inspect Commodity

If:	And:	Then:
Time limits have been met	You decide to verify only the contents of the shipment because the exporter has an acceptable inspection certificate	1. VERIFY the contents of the shipment 2. SKIP to “Step 9: Record Inspection Results” on page-3-5-16
	You decide to inspect the shipment	GO to “Step 3: Determine the Sample Size” on page-3-5-5
Time limits have not been met and shipment must be reinspected or retested	→	

Step 3: Determine the Sample Size

Whether inspecting the commodity visually or drawing samples for a laboratory analysis, ACOs **must** decide whether the sample size includes the entire shipment or an officially drawn representative sample.



Always follow [Safety Precautions for Sampling and Inspecting](#) on page 3-5-9.

Factors to consider when determining sample size:

- ◆ Existing guidelines
- ◆ Experience with similar commodities
- ◆ Import requirements of the foreign country
- ◆ Size of shipment
- ◆ Where the commodity was grown or produced

Go to [Table 3-5-4](#) on page-3-5-8 to determine sample size.

Officially Drawn Representative Samples

Representative samples, for inspectional or testing purposes, **must be** drawn by an ACO or other designated personnel. For policy about who may draw official samples, refer to [Official Samples and Inspection](#) on page 2-1-7.

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 PPQ Accreditation Manager. See [Special Programs • Seed Health Accreditation](#) on page 5-9-1.

Officially drawn samples, which are the basis for certification, **must be** large enough to represent the entire lot and **must be** of a nature to accurately reflect the conditions of the entire shipment.

Two Percent Level

The minimum inspection level for *fruits and vegetables* is 2% 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% inspection of 8 boxes (.02 x 400 boxes = 8 boxes). 2% is a minimal level.

The inspection level for plant material (*nursery stock*) and other high-risk material should be 100% or as close to 100% 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%. Consult the appropriate State or Federal officials for these inspection levels.

Hypergeometric Table (95% confidence level)

You may use the hypergeometric table for inspecting large consignments where it is impracticable to use the two percent inspection level. To be 95 percent sure that you will find the pest when 10 percent or more of the shipment is infested, randomly select a specific number of units in the shipment. Determine this number of units by using the hypergeometric table illustrated in [Table 3-5-3](#) on [page-3-5-7](#). Inspect each of these units to ensure that:

- ◆ No hitchhiker pests or surface feeders are present in the unit
- ◆ No internal feeding insects are present in randomly selected plant part in the unit
- ◆ No mismanifested or smuggled items are present

This 10 percent infestation level may change as data for Agricultural Quarantine Inspection Monitoring (AQIM) is collected and analyzed.

TABLE 3-5-3: Hypergeometric Table for Random Sampling

Total number of inspectional units:	Randomly select this number of units to inspect:
1-10	10
11-12	11
13	12
14-15	13
16-17	14
18-19	15
20-22	16
23-25	17
26-28	18
29-32	19
33-38	20
39-44	21
45-53	22
54-65	23
66-82	24
83-108	25
109-157	26
158-271	27
272-885	28
886-200,000	29

TABLE 3-5-4: Determine Sample Size

If you are going to:	Then:
Inspect 100% of the shipment	<ol style="list-style-type: none"> 1. OBSERVE <i>Safety Precautions for Sampling and Inspecting</i> on page 3-5-9 2. GO to “Step 4: Compare Shipment to Supporting Documents” on page-3-5-10
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 commodities ◆ Import requirements of the foreign country ◆ Size of shipment ◆ Where the commodity was grown or produced 2. OBSERVE <i>Safety Precautions for Sampling and Inspecting</i> on page 3-5-9 3. DRAW an official sample 4. GO to “Step 4: Compare Shipment to Supporting Documents” on page-3-5-10
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 commodities ◆ Import requirements of the foreign country ◆ Size of shipment ◆ Where the commodity was grown or produced 2. OBSERVE <i>Safety Precautions for Sampling and Inspecting</i> on page 3-5-9 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-3-5-10

1 For information on laboratory accreditation, go to the following Web site address: <<http://www.aphis.usda.gov/ppq/pim/accreditation/>> or see [Special Programs • Seed Health Accreditation](#) on **page 4-16-1**.

Safety Precautions for Sampling and Inspecting

Check the label or description for special instructions regarding exposure to see if the commodity has been treated. 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, refuse to sample or inspect, and contact your supervisor.

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

Keep informed. Safely inspect treated plant material. Potential illness can be prevented. Well-informed officials are more likely to take precautionary measures in handling treated plant material and contribute to PPQ's excellent safety record (for additional information on safety, see *Pesticide Safety* in the PPQ *Treatment Manual* <http://www.aphis.usda.gov/ppq/manuals/port/Treatment_Chapters.htm>).

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


Step 4: Compare Shipment to Supporting Documents

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

- ◆ Distinguishing marks and numbers
- ◆ Quantity of commodity
- ◆ Type of commodity

Use [Table 3-5-5](#) on [page-3-5-10](#) to take the appropriate action.

TABLE 3-5-5: Verify That Commodity is as Listed on Supporting Documents

If the commodity:	And after allowing the exporter the opportunity to correct the discrepancies, the exporter:	Then:
Is the same as listed on supporting documents		GO to “Step 5: Inspect the Commodity” on page-3-5-11
Is different than listed on supporting documents (allow the exporter to correct the discrepancies)	Corrects the discrepancies	
	Does not correct the discrepancies	1. REFUSE to issue an export certificate 2. GO to “Step 9: Record Inspection Results” on page-3-5-16 3. EXIT this manual

Step 5: Inspect the Commodity

Inspect the commodity for general pests, those pests usually associated with that host, and those pests specifically listed in the export summary or on the IP. Use [Table 3-5-6](#) on [page-3-5-11](#) 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 **except** in the following cases:

- ◆ Fungicide- or insecticide-treated corn seed (*Zea mays*) may be tested using ELISA technique to detect Stewart’s bacterial wilt (*Pantoea stewartii*) (=Erwinia stewartii)¹
- ◆ Laboratory testing for *Claviceps africana* which **must** include a structural examination at 10x or greater magnification¹

Pelletized and *embedded* seeds **cannot** be certified unless the inspection is conducted prior to treatment and time limits are met.



Always follow [Safety Precautions for Sampling and Inspecting](#) on [page 3-5-9](#).

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. Refer to [Special Procedures](#) on [page 4-5-1](#) and [Commodity • Seed](#) on [page 4-5-1](#) for further information.

TABLE 3-5-6: 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, INFORM the exporter of the infestation and/or infection 2. GO to “Step 6: Obtain Pest Identity” on page-3-5-12
Absent	GO to “Step 8: Look for Packaging or Other Material” on page-3-5-15

¹ Based on a 2004 review by the National Seed Health System, Seed Technical Working Group of the Pataky and Block paper (Plant Disease 88: 633-640).

Step 6: Obtain Pest Identity

Obtain the identity of the intercepted plant pest. Use [Table 3-5-7](#) on [page-3-5-12](#) to take the appropriate action.

TABLE 3-5-7: Action to Take to Identify the Intercepted Plant Pests

If you are a:	And you:	Then:
Federal ACO	Have identification authority for the intercepted plant pest	GO to <i>“Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest”</i> on page-3-5-13
	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 <i>“Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest”</i> on page-3-5-13
State or county ACO	Have identification authority for the intercepted plant pest	GO to <i>“Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest”</i> on page-3-5-13
	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 <i>“Step 7: Determine if the Plant Pest Is Quarantine Significant or an Injurious Plant Pest”</i> on page-3-5-13

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 IP to determine whether the plant pest is either of the following:

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


Use [Table 3-5-8](#) on [page-3-5-13](#) and [Table 3-5-9](#) on [page-3-5-14](#) to take the appropriate action.

TABLE 3-5-8: Action to Take When Commodities 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 3-5-9 on page-3-5-14
Not listed in the export summary as being quarantine significant	Injurious to the commodity	Is considered practically free ¹	GO to “Step 8: Look for Packaging or Other Material” on page-3-5-15
		Cannot be considered practically free	GO to Table 3-5-9 on page-3-5-14
	Not injurious to the commodity	—————→	GO to “Step 8: Look for Packaging or Other Material” on page-3-5-15

1 For export certification purposes, the working definition of practically free is **not** exceed a 2% infestation level unless otherwise stated by the importing country. Practically free also refers to a judgment 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 insects found in grain.

TABLE 3-5-9: 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	<ol style="list-style-type: none"> 1. ALLOW the exporter to treat or recondition the commodity 2. MONITOR the treatment <div style="display: flex; align-items: center; justify-content: center;">  <div style="margin-left: 10px;"> <p>Important</p> <p style="background-color: #e0f2f1; padding: 5px;">Make no mention of the infestation or infection on the export certificate; only RECORD the treatment in the appropriate section.</p> </div> </div> <ol style="list-style-type: none"> 3. GO to “Step 8: Look for Packaging or Other Material” on page-3-5-15
Unavailable for the plant pest	<ol style="list-style-type: none"> 1. REFUSE to issue an export certificate 2. GO to “Step 9: Record Inspection Results” on page-3-5-16
Unacceptable to the foreign country as a condition of entry	<ol style="list-style-type: none"> 3. EXIT this manual

Step 8: Look for Packaging or Other Material

Packaging or other material that may be associated with the shipment, such as wood packaging material, bagging, containers, soil, etc., **must** also meet the importing country’s requirements.

Use **Table 3-5-10** on **page-3-5-15** to determine the action to take on shipments contaminated with soil or with unauthorized packing material, bagging, or containers.

TABLE 3-5-10: Action to Take when Commodity is Associated with Packaging Material, Bagging, Containers, etc.

If the shipment:	And the exporter:	Then:
Is free from prohibited material, or contains material that meets importing country’s requirements		GO to “Step 9: Record Inspection Results” on page-3-5-16
Is not free from prohibited material, or contains material that does not meet importing country’s requirements	<p>Cleans, treats, and/or reconditions shipment</p> <p>Refuses to clean, treat, or recondition shipment</p>	<ol style="list-style-type: none"> 1. REFUSE to issue an export certificate 2. GO to “Step 9: Record Inspection Results” on page-3-5-16 3. EXIT this manual

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 or not to certify the commodity. 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 3-5-11](#) on [page-3-5-17](#).

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

1. Place (port and location) where the commodity was inspected.
2. Percentage (how much) of material was 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 commodity eligible for certification such as repackaging, reconditioning, or debarking.
6. Unusual situations concerning the shipment, **such as reasons for not certifying the shipment**.
7. ACO signature.
8. Date and time of the inspection (ensure that the inspection was conducted within specified time limits).


TABLE 3-5-11: Record Inspection Results

If you are recording inspection results on:	Then:
PPQ Form 572, Application for Certification	<ol style="list-style-type: none"> 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 commodity was inspected ◆ LIST in <i>Block 13</i>, percentage (how much) of material was 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 commodity eligible for certification (such as repackaging, reconditioning, debarking, intended use, notation of AD, pest or disease freedom, presence or absence of IP, foreign export 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 an Export Certificate” on page-3-5-18, if applicable
PPQ Form 577, Phytosanitary Certificate	<ol style="list-style-type: none"> 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 commodity was inspected ◆ LIST in <i>Block 2</i>, percentage (how much) of material was 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 commodity eligible for certification (such as repackaging, reconditioning, debarking, intended use, notation of AD, pest or disease freedom, presence or absence of IP, foreign export 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	<ol style="list-style-type: none"> 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 commodity was inspected ◆ LIST in <i>Block 2</i>, percentage (how much) of material was 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 commodity eligible for certification (such as repackaging, reconditioning, debarking, intended use, notation of AD, pest or disease freedom, presence or absence of IP, foreign export 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 2. GO to “Step 10: Prepare an Export Certificate” on page-3-5-18, if applicable

Step 10: Prepare an Export Certificate

After recording the inspection results and deciding to issue an export certificate, proceed to preparing and distributing the proper export certificate. Use [Table 3-5-12](#) on [page-3-5-18](#) to determine the action to take based on the inspection results.

TABLE 3-5-12: Action to Take Based on Inspection Results

If the commodity:	And you are a:	And the commodity is:	Then:
Met the import requirements based on supporting documents and inspection results	Federal ACO	Unprocessed, domestic origin	<ol style="list-style-type: none"> GO to PPQ Form 577, Phytosanitary Certificate on page 3-8-2 COLLECT a user fee or RECORD a prepaid PPQ Form 577 (see Collecting User Fees on page 3-11-1)
		Unprocessed, foreign origin	<ol style="list-style-type: none"> GO to PPQ Form 579, Phytosanitary Certificate for Reexport on page 3-8-15 COLLECT a user fee or RECORD a prepaid PPQ Form 579 (see Collecting User Fees on page 3-11-1)
	State or county ACO	Unprocessed domestic origin	<ol style="list-style-type: none"> GO to PPQ Form 577, Phytosanitary Certificate on page 3-8-2 If applicable, SEE your local policy for collecting user fees
		Unprocessed foreign origin	<ol style="list-style-type: none"> GO to PPQ Form 579, Phytosanitary Certificate for Reexport on page 3-8-15 If applicable, then SEE your local policy for collecting user fees
Did not meet the import requirements based on inspection results			<ol style="list-style-type: none"> REFUSE to issue an export certificate EXIT this manual