

2

Export Program
Manual

Policy

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Accreditation

Accreditation is official recognition of proficiency resulting in the approval and authority to perform specific tasks or provide specific services in full or partial support of official obligations. Accrediting people, organizations, facilities and processes associated with phytosanitary inspection, treatment, or testing, enhances the ability of Plant Protection and Quarantine (PPQ) to protect plant resources and facilitate trade. Accreditation recognizes consistent levels of competency and confers specific authority. Those accredited have obligations with respect to applications, personnel training, and quality assurance to become and remain accredited. Accreditation standards set out the responsibilities for both PPQ and the accredited facilities.

Authorized Certification Official (ACO) Accreditation is in accordance with 7CFR353 and the North American Plant Protection Organization (NAPPO) standard for authorized certification officials for issuance of export certificates. See also [Special Programs • Authorized Certification Official \(ACO\) Accreditation](#) on page 5-1-1.

The following link will take you to PPQ's accreditation website:
<http://www.aphis.usda.gov/ppq/pim/accreditation/index.html>

For information on seed health accreditation, see [Special Programs • Seed Health Accreditation](#) on page 5-9-1.

Additional Declarations (ADs)

An AD is “a statement that is required by an importing country to be entered on a phytosanitary certificate and which provides specific additional information on a consignment in relation to regulated pests.” [FAO, 1990; revised ICPM, 2005]. Additional requirements may be listed in the EXCERPT export summary or on official communication from the National Plant Protection Organization (NPPO) of the importing country.

Acceptable ADs

Before attesting to the conditions of an AD, ACOs must determine that the AD is allowed by PPQ policy. ADs can only be included on PPQ Forms 577 or 579 when they are required by the importing country and conform to PPQ policy. If a required AD is prohibited by PPQ policy, certification cannot be provided. ADs of this type are typically requirements that ACOs cannot verify (such as heat treatment of seed), or ADs of a non phytosanitary nature. All ADs must be verified by an ACO and supported by documentation.

Authority for Entering Additional Declarations

Only ACOs and Authorized Entities in PCIT have the authority to enter ADs on PPQ Forms 577 or 579. Exporters, shippers, or brokers are not allowed to enter ADs on PPQ Forms 577 or 579, except when the ACO's workload does not allow preparation of the certificate. In these rare cases, the ACO must dictate the required AD to the exporter and check the wording for accuracy. It is not permissible to put ADs on PPQ Form 578, Export Certificate, Processed Plant Products.

Amending an Additional Declaration

There are instances in which the AD required by an importing country must be amended. If the pest or pathogen is not known to occur in the U.S. or a political subdivision thereof, such as a State, and the requested AD asks for freedom from the pest or pathogen, the AD must be changed to read that the pest does not occur in the U.S. or identified State(s).



ACOs **must never** attest to freedom or apparent freedom from plant disease causing organisms such as fungi, nematodes, etc.

Exceptions to this policy are the following:

- ◆ When the pathogen is not known to occur in the U.S.
- ◆ When there is an ongoing national survey for the pathogen (currently **only** Karnal bunt of wheat, *Tilletia indica*)
- ◆ Special programs approved by ES

In addition, laboratory testing **cannot** be used as a basis for certification because a methodology for representative sampling and testing for disease causing organisms in grain has **never** been developed. This prohibition applies regardless of whether the requirement is stated in an export summary, an IP, or letter of credit.

Prohibited ADs

A list of prohibited statements is found in [Appendix B](#). These statements are **not** allowed by PPQ policy because they are **not** phytosanitary in nature. Some of the prohibited statements are of a commercial nature and that is **not** the purpose of the PPQ 577 or PPQ 579.

Certification of Canadian Produced Seed

All propagative material imported into the United States is required to have a phytosanitary certificate from the country of exportation, except for Canadian produced seed. Seed produced in Canada and reexported from the United States has experienced entry problems when shipped to a third country because of the absence of a Canadian phytosanitary certificate. To facilitate the United States' trade of Canadian produced seed, options are available for certifying Canadian produced seed being reexported from the United States (see [Certifying Canadian Produced Seed](#) on page 4-5-15).

Commodity Sampling and Testing

It is PPQ policy that all samples used for export certification purposes be officially drawn by Federal, State, or County officials or by a non government-accredited entity. This includes samples for laboratory analysis for pathogens, weed seed examination, insect examination, etc.

Additionally:

1. The shipment **must** remain intact, meaning there are **no additions** to the total count or weight of the shipment.
2. The shipment **must** remain unadulterated after testing has taken place.

For those pests that normally infest or infect plants in the field, Authorized Certification Officials (ACOs) **must** ensure the regulated pests of concern cannot infest or infect the commodity after official inspection, testing, or treatment has taken place. To make this determination ACOs should confer with an entomologist, pathologist, nematologist, etc. If a PPQ Form 577 or 579 is issued based on a laboratory test conducted outside of specified time limits, keep documentation supporting the decision with the file copy of the export certificate.

The above policy **does not**:

- ◆ Supersede specific instructions in an export summary in EXCERPT, work plans, or other official communication with respect to laboratory tests and time limits
- ◆ Change the policy with respect to inspection and time limits; inspections **must** be conducted within specified time limits

Laboratory Analyses Time Limits

ACOs **must** caution exporters that shipments **cannot** be certified prior to receipt of the laboratory analyses.

Genetically Modified Organisms

PPQ Forms 577, 578, 579 **cannot** be used to certify the Genetically Modified Organism (GMO) status of a commodity. If a country requires that these export certificates attest to GMO status, then the export certificate **cannot** be issued. Export Services, once notified, will contact the importing country to negotiate the removal of any GMO requirement.

If the importing country has GMO requirements that are not tied to phytosanitary certification, various other Federal agencies may be able to assist an exporter to meet foreign GMO requirements.

The Grain Inspection, Packers and Stockyards Administration (GIPSA) is a source for GMO certification or letterhead statements for grain. These letterhead statements may or may not meet an importing country's requirements. ACOs can refer exporters to the GIPSA Office of International Affairs (202-720-0226) for assistance on GMO inquiries for grain.

Refer to the following website for information:

<http://archive.gipsa.usda.gov/reference-library/directives/9180-67.pdf>

Grain

The U.S. inspects for weed seed in grain when it is required by an additional declaration or other official communication from the importing country. By definition grain is intended for processing or consumption and is generally recognized as low risk for the introduction of weeds. This policy remains in effect even if the weed is listed as a regulated pest by the importing country.

When ACOs are certifying shipments of grain, and a particular pathogen that occurs in the U.S. must be addressed, PPQ's policy prohibits making statements regarding disease freedom in any AD. The reason for this policy is that it is impractical to:

- ◆ Inspect parent plants during active growth in the field
- ◆ Identify and preserve the grain produced from those fields due to normal movement and commingling
- ◆ Adequately inspect for disease organisms once grain is harvested

Federal Grain Inspection Service (FGIS) Inspection Authority

The demand for phytosanitary certification services has increased due to U.S. trading partners' progressively more complex phytosanitary requirements and increases in the volume of trade. To meet this demand, PPQ has explored alternative resources to provide phytosanitary inspections. One such resource is the FGIS, which has been a cooperative partner providing phytosanitary inspection for grains for over twenty years. Expanding on this cooperative relationship, PPQ and FGIS have agreed to extend the list of eligible plant products for which they can provide phytosanitary inspection. In addition to inspecting grain (milled or not), FGIS is authorized to provide phytosanitary inspections for the commodities listed under the heading [Species that FGIS Can Inspect](#) on [page 4-3-4](#) if they are derived from grain.

International Plant Protection Convention (IPPC)

The IPPC is an international treaty to secure action to prevent the spread and introduction of pests and to promote appropriate measures for their control. It is governed by the Commission on Phytosanitary Measures (CPM) which adopts International Standards for Phytosanitary Measures (ISPMs). The CPM has provided the International Phytosanitary Portal (IPP) as the preferred forum for national IPPC reporting and the exchange of more general information among the phytosanitary community. The IPPC Secretariat coordinates the activities of the Convention and is hosted by the Food and Agriculture Organization (FAO) of the United Nations. The U.S. is a signatory to the IPPC. Use the following link to access the IPPC Web page.

<https://www.ippc.int/IPP/En/default.jsp>

Letters of Credit

For the purposes of export certification, letters of credit **cannot** be considered official notifications of changes or exceptions to plant quarantine regulations. Official notifications or exceptions **must** come from the National Plant Protection Organization (NPPO) of the foreign countries. Therefore, letters of credit are **not** phytosanitary documents and **cannot** be referenced on an export certificate.

All export certificates **must** contain **only** information related to phytosanitary matters. They should **not** include statements that requirements have been met and should **not** include references to animal or human health matters, pesticide residues or radioactivity, or commercial information such as letters of credit.

PPQ policy is consistent with standards produced by the International Plant Protection Convention (IPPC) policy. Use the following link for verification.

https://www.ippc.int/servlet/BinaryDownloaderServlet/16199_ISPM_12_E.pdf?filename=1146658528409_ISPM12.pdf&refID=16199

Official Samples and Inspection

It is PPQ policy that the issuance of a PPQ Form 577 **must always** be based on an official sample and official inspection. Adhering to this policy further ensures shipment integrity and program credibility.

The sampling and inspection of commodities for the issuance of a PPQ Form 578 **do not** have to be official samples; they may be submitted by the exporter.

The necessity to conduct official sampling and inspections of commodities being certified with either a PPQ 578 or PPQ 579 will depend on a number of factors. For detailed information on the sampling and inspection requirements for the issuance of these certificates, refer to the following:

- ◆ PPQ 578: [Completing PPQ Form 578](#) on page 3-9-1
- ◆ PPQ 579: [PPQ Form 579, Phytosanitary Certificate for Reexport](#) on page 3-8-15

Only authorized officials can draw samples and conduct inspections of commodities for which a PPQ 577 and PPQ 579 (when an inspection is required) may be issued. Under **no** circumstances can an exporter provide his or her own sample for inspectional purposes.

Official sampling and inspecting may be conducted by:

- ◆ Cooperating agencies such as Federal Grain Inspection Service (FGIS) for grain and grain products (see [Commodity • Grain \(Federal Grain Inspection Service \(FGIS\)\)](#) on page 4-3-1) or Agricultural Marketing Service (AMS) for specific commodities
- ◆ Federal, State, or County officials
- ◆ Non government entities accredited for seed sampling and inspection (see [Special Programs • Seed Health Accreditation](#) on page 5-9-1)

Export Certificates

PPQ Forms 577 and 579

The export program **does not** require certification of exports, but does provide certification of commodities as a service to U.S. exporters. After assessing the phytosanitary condition of the commodities intended for export, relative to the receiving country's regulations, an ACO issues these internationally recognized phytosanitary certificates:

- ◆ Phytosanitary Certificate (PPQ Form 577)
- ◆ Phytosanitary Certificate for Reexport (PPQ Form 579)

No liability is attached to the United States Department of Agriculture (USDA) or to any of its representatives with respect to phytosanitary certificates.



Phytosanitary certificates can **only** be used in international trade.

PPQ Forms 577 and 579 follow the format of the international model established by the International Plant Protection Convention (IPPC), and are used to document the phytosanitary condition of exported commodities. Before issuing PPQ Form 577 or 579, the Authorized Certification Official (ACO) signing the form **must** officially verify that the consignment has been inspected and that all the phytosanitary requirements of the importing country have been met. Anytime a PPQ Form 577 or 579 is issued, the preprinted certification statement assures the importing country that the shipment conforms to its requirements regarding freedom from regulated pests and practically free from non regulated pests.

PPQ issues phytosanitary certificates in accordance with ISPM 12 of the IPPC:

http://www.spc.int/pps/IPPC%20ICPM%20ISPM/ISPMs_new/Eng/ISPM_12_English.pdf

ACOs can issue PPQ Forms 577 and 579 for those commodities listed in an export summary as unrestricted products if they are eligible for certification. Therefore, if the exporter still wants an export certificate for an unrestricted product, is willing to pay the user fee, and the commodity is eligible for an export certificate; then ACOs can issue one with **no** additional declaration and based on inspection results.

PPQ Form 578

Even though a PPQ Form 578 (Export Certificate, Processed Plant Products) is not a phytosanitary certificate, there is a similar statement preprinted in the signature block regarding freedom from injurious plant pests due to the processed nature of the shipment.

In addition, PPQ Form 578 assists U.S. exporters whose shipments may be placed in jeopardy if an official document is **not** issued. PPQ Form 578 was created by PPQ to fill a void where **no** other USDA agency certification existed or could be adapted. PPQ Form 578 can only be issued for items listed in EXCERPT under “Commodities Eligible for a PPQ 578.”

Phytosanitary Certificate Issuance & Tracking (PCIT) System

The USDA, Animal and Plant Health Inspection Service (APHIS) 2007 Regional Operational Plans included implementation of the PCIT system as a main objective. U.S. industry’s desire to utilize this system is growing, and APHIS must respond to that need. PPQ employees involved with the export program are required to support and facilitate the use of PCIT by industry and cooperators.



Important

Use of PCIT for export certification became mandatory for all PPQ offices on October 1, 2007.

What This Means to PPQ Offices

- ◆ All PPQ employees involved with the export program should know how to log in and use PCIT
- ◆ All PPQ Forms 577 and 579 **must** be issued through PCIT
- ◆ Paper PPQ Forms 577 and 579 should be retained for back-up in case the system is down for more than 4 hours
- ◆ All applications for certification should either be entered by the exporter through PCIT or be entered by the associated PPQ duty station. Ideally, industry will enter these applications; therefore, PPQ employees should encourage industry to use PCIT to submit applications.
- ◆ PPQ employees should work with industry contacts by educating them on the system and its advantages.

Industry or government officials may access the PCIT system directly at: <https://pcit.aphis.usda.gov/pcit/>. Industry users can register their own organizations and submit applications to any duty station. Government users should contact their local Export Certification Specialist for their initial user ID and password.

The system currently allows users to generate the following three forms:

- ◆ PPQ Form 572 - Application for Inspection and Certification of Domestic Plant and Plant Products for Export
- ◆ PPQ Form 577 - Phytosanitary certificate¹
- ◆ PPQ Form 579 - Phytosanitary Certificate for Reexport¹

Additional enhancements to the PCIT system are underway.

The PCIT system enables PPQ managers to obtain real-time information in order to respond to foreign notices of non-compliance and World Trade Organization notices.

Record Keeping

Confidentiality

Records containing privileged or confidential trade secrets and commercial or financial information (obtained from a person) is exempt from mandatory release under the Freedom of Information Act (FOIA). (See Title 5, United States Code, Section 552(b)(4).) However, the FOIA **only** applies to agency records, those in the possession and control of a Federal agency at the time the FOIA request is made.

If someone requests a completed or partially completed certificate, a State record that provides the basis for a certificate, or any information in these documents, the request **must** be forwarded to the Freedom of Information Act/Privacy Act (FOIA/PA) Officer for PPQ at the following address:

Legislative and Public Affairs Staff, APHIS, USDA
4700 River Road, Unit 50
Riverdale, Maryland 20737-1232
Phone: 301-734-8296

¹ A copy can be printed by an exporter, while the original can only be printed by authorized entities and authorized certification officials.

Certificates and State records that provide the basis for certificates maintained by State cooperating agencies are **not** subject to the Federal FOIA. However, many States have open government laws that may require the release of records maintained by State agencies. Therefore, if someone requests a completed or partially completed certificate, a State document that provides the basis for a certificate, or any information in these documents, the State or County employee should **not** release the document or information unless appropriate State officials determine that release of the document or the information in the document is required by State law.

Retention

PPQ policy on retaining forms is as follows:

- ◆ PPQ Forms 577, 578, and 579 and all supporting documentation: retain for 3 years
- ◆ All CITES and supporting documentation: retain for 5 years

Replacing PPQ Forms 577 or 579 for Commodities in a Foreign Country

If a consignment has been exported from the United States and it has been or is being stored or repackaged in a foreign country, a PPQ Form 577 or 579 **cannot** be replaced to change the country name to a different country. This policy applies whether the commodity has or has not officially entered the commerce of the importing country. The storage or repackaging of a consignment in another country may result in a change of the phytosanitary status of the consignment and the exporter will need to request a reexport certificate from the country in which the commodity is being stored or repackaged.

Seed Sampling and Testing

Federal laboratories, State university laboratories, private labs, and companies accredited under the USDA-APHIS-PPQ Accreditation Program may test and sample seed. A list of non government-accredited entities is provided as a Phytosanitary Note in EXCERPT. Additionally, non government-accredited entities are authorized to perform **only** those specific phytosanitary functions for which accreditation is held and listed.



Seed **must** be sampled and inspected prior to encapsulation (pelletized seed) or embedding into other media (e.g., seed mats).

- ◆ Should the seed be treated with a fungicide or pelletized after the laboratory analysis or test, the increase in weight **must** match the amount of product applied to the seed.
- ◆ Some laboratory analyses **cannot** be conducted on treated seeds. The ACO **must** check with the laboratory first before submitting a sample(s).
- ◆ The lot number **cannot** change after the laboratory analysis or test has taken place.

Samples drawn or submitted by a seed company or other industry representatives (i.e., nonaccredited entities) are **not** permitted.

Time Limits

If a country requires a laboratory test and the pests (any class of regulated pest) of concern **do not** attack/**cannot** attack the commodity post-harvest, the laboratory test **does not** have to be conducted within the time limits specified either by the country or PPQ's general policy on time limits, if the following conditions are met:

1. Seeds were harvested and were put into storage;
2. Regulated pests of concern **cannot** infest the seeds post-harvest;
3. The seed lot has remained unadulterated since the laboratory test was conducted.

In addition, field inspections **do not** have to meet time limits if the regulated pests of concern cannot infest the seeds post-harvest.

For general information on time limits pertaining to inspections and certificate issuance, see [Time Limits](#) below.

Time Limits

“Time limits” refer to restrictions on the period that is allowed between inspections and certificate issuance. In addition to PPQ's policy on time limits, each importing country may specify its own time limit requirements.

In order to ensure time limits are met, it is important to understand the difference between each type of date.

- ◆ Inspection date: date an Authorized Certification Official (ACO) or other authorized entity conducts the phytosanitary inspection
- ◆ Issuance date: date a certificate is signed

While the dates of issuance and inspection can be the same, they are two different actions.

PPQ's policy on time limits is that an export certificate **must** be issued within 30 days of the phytosanitary inspection. PPQ policy **must** be met even if a country's time limits refers to the time period between certificate issuance and exportation.



The exporter is responsible for maintaining the identity and integrity of the consignment and for safeguarding the commodity after inspection from infestation or infection from harmful organisms.

Importing Country Requirements

Importing countries' time limits, if specified, will be included in the country's definition of a phytosanitary certificate, phytosanitary certificate for reexport, and the processed product certificate in EXCERPT under *Definitions of Terms and Coded Abbreviations*. Additionally, time limits may be specified for an individual commodity or class of commodities elsewhere in an export summary. Failure to review an individual country's time limits may result in improper certification.



Consignments must continue to meet the importing country's time limits. If an importing country's time limit is more restrictive than PPQ's policy, the country's time limit requirement will take precedence.

Replacing PPQ Forms 577 and 579

Replacing PPQ Forms 577 and 579 is acceptable outside the 30 day time limit if the original certificate was issued within 30 days of inspection and the quantity is not increased.

Treatments

Introduction

All treatments required as the basis for issuing PPQ Forms 577 and 579 **must**:

- ◆ Be conducted following the procedures in the PPQ *Treatment Manual* or any labelled use product—this is true if the treatment is supervised by PPQ or by a State or County official
- ◆ Be monitored or supervised by a Federal, State, or County plant quarantine official
- ◆ Be conducted under the conditions of the APHIS/FGIS MOU and listed on FGIS Form 921-2



ACOs may **not** certify any treatment that violates State or Federal EPA label requirements, even if the importing country requires such a treatment for certification.



If a treatment is mandatory, it must be included in the treatment section of the certificate.

PPQ Policy does not permit treatment details to be recorded in the *Disinfestation and/or Disinfection Treatment* block unless the treatment is witnessed or verified by an ACO, conducted by FGIS and listed on FGIS form 921-2, or specified in EXCERPT as an exception. Verify and record details of the treatment in the appropriate section of the certificate. Examples of the verification of treatments not witnessed by the ACO are the following:

EXAMPLE

- ◆ Evidence of kiln drying by “KD” marks on lumber, checking moisture content and inspecting kiln charge chart
- ◆ Evidence of compression of cotton bales such presence of PBI tags and bale weight(s)

Official sampling and inspections should be done before any treatment, even if the treatment is mandatory. Should pests be detected, use the [Treatment Manual](#) to verify the required treatment efficacious against the pests of concern. After the appropriate treatment there should be **no** need to reinspect. If there was **no** opportunity to inspect prior to treatment, it would be necessary to inspect to meet the inspection requirement.

Regardless of the type of treatment the commodity was subjected to, the treatment may **not** have been efficacious against all the regulated pests that may be present in a shipment.

EXAMPLE

- ◆ Methyl bromide (MB) treatments: Mandatory MB treatment is required for a specific pest. Even though a mandatory treatment may be required, this treatment may **not** be effective against all quarantine pests in the shipment. Therefore, it is important to inspect the product prior to treatment to determine all the quarantine pests that are present. Then you will need to determine if the mandatory MB treatment required for certification would be effective against all the pests. If it is **not**, then the shipment may **not** be able to be certified.
- ◆ Seeds treated with a fungicide: fungicides may **not** kill insects, snails, etc.



Important

Treatments listed on an FGIS Form 921-2 (01-07) can be included on a PPQ Form 577 or 579. Refer to the following topics for more information:

- ◆ **Does the Commodity Require Treatment or Was a Treatment Conducted?** on page 3-4-13
- ◆ **“Step 1: Determine if the Exporter Has Acceptable Documentation That Would Preclude an Additional Inspection”** on page-3-5-3.

Treatments are **not** allowed to be included on PPQ 578.

Under certain circumstances a notarized letter of the treatment performed can be accepted from a licensed pest control operator. Prior to these special treatments, the pest control operator should be provided with the appropriate parts of the PPQ *Treatment Manual* and be advised to follow these procedures. This type of unmonitored treatment should **only** be used when the company is **not** routinely involved in regulatory treatments and when other options are **not** available.

Fumigation

Any commodity for export requiring fumigation **must** be fumigated in the same manner as prescribed in the PPQ *Treatment Manual*. ACOs **must** ensure the minimum concentration readings are achieved. Maintaining the minimum concentration level ensures an effective treatment. This practice includes both PPQ and its authorized cooperators.



Important

Caution exporters that all in-transit vessels are required to be equipped with a proper recirculation system for phosphine fumigation in ship holds. This system allows the fumigant to circulate evenly. Do not issue an export certificate until this system is in place. Contact the Center for Plant Health Science and Technology (CPHST) at 919-855-7450 for technical guidance.

Certifying Seed Treatments

With the exception of fumigation, it may **not** be necessary to be physically present to witness the treatment when certifying a seed treatment on an export certificate. If a treatment is indicated on the label of the seed, it is monitored by the State personnel to insure Environmental Protection Agency (EPA) compliance. In such cases it is acceptable to attest to seed treatments based on the information contained on the seed label.



Do not attest to treatments listed on foreign seed labels on a reexport certificate because a U.S. plant quarantine official did **not** monitor the treatment in the foreign country.

User Fees

It is PPQ policy to collect user fees for export certificates. PPQ has the authority to collect user fees through 7 CFR 354.3.

PPQ's policy regarding user fees is as follows:

- ◆ Charge **no** fees for certificates replaced due to Authorized Certification Official (ACO) error
- ◆ Charge overtime for issuance of certificates outside of normal duty hours
- ◆ Collect fees from government agencies through interagency agreements

State/County cooperators can establish their own fees for issuing PPQ Forms 577, 578, or 579, based on 7 CFR 354.3.