# RCC Agriculture and Food 1 Working Group: Perimeter Approach to Plant Protection

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Deliverable outcome	A perimeter approach to protecting Canada-US territory from the unintentional introduction of pests and invasive alien species via movement of plants and plant products through equivalent approaches to regulatory compliance and enforcement efforts and information sharing to leverage each country's work to mutual advantage.				
	In parallel, initiate work to identify similarities (enablers), differences and gaps (barriers) between the respective systems and streamline the certification process for plants and products thereof, including evaluating redundant certification, data elements requirements and associated administrative procedures for shipments flowing between Canada and the US, depending on the type of product/risks, while maintaining appropriate protection of plant health.				
NAPA Initiative	Reinvigoration of the North American Perimeter Approach (NAPA) initiative.				
	The objective of NAPA is to mitigate shared pest risks to Canada and the United States associated with plants and plant products arriving from third countries. Through NAPA, the United States and Canada will work towards equivalency in regulatory systems through alignment to the extent possible, of phytosanitary import requirements.				
	The NAPA initiative will result in: <ul> <li>Increased consistency, where appropriate, between Canadian and US import requirements related to plant health risks.</li> <li>Increased cooperation and communication between the two countries.</li> <li>Development of an equivalent or harmonized plant quarantine system.</li> </ul>				
	Desired Outcomes  • Minimize the need for programs to address differences in our regulatory systems  • Facilitate efficient and safe movement of plants and plant products between Canada and the US.  • Efficiently protect the continental US and Canada from plant pests introduced from abroad.  • Focus the use of limited resources to target high risk areas outside Canada and the US				
Timeline	Action Item 1: Develop a Framework for a Canada-US Perimeter Approach to Plant Protection	Action Item 2: NAPA Pilot - Coordination of approaches to regulatory oversight - Chrysanthemum White Rust (CWR).	Action Item 3: NAPA Pilot - Streamline commodity certification process - Greenhouse Certification Program (GCP)		

- Development of a communications plan for ongoing consultation with stakeholders as the work of the NAPA moves forward. Communications plan to identify:
- a) key stakeholder groups to be consulted on specific ongoing initiatives (such as pilots)
- b) key stakeholder groups with an interest in the NAPA initiative at large
- c) existing fora which can be used for face to face consultation
- d) tools to communicate status updates, and solicit input
- e) key issues requiring targeted consultations
- f) a timetable

## 3-6 Months

- 2. Initiate a review of the present North American Perimeter Approach (NAPA) Terms of Reference to assess alignment with the principles of the RCC. The objective of the current NAPA initiative provides a bilateral fora to work towards regulatory equivalency, thereby facilitating movement of plant commodities across the border while mitigating plant health risks of mutual concern. A high level review would serve to inform and define guiding principles for the NAPA consistent with the vision of the RCC for lasting mechanisms of regulatory alignment, and allow CFIA and USDA-APHIS to focus on regulatory efforts on the North American border rather than the Canada/U.S. border.
- 3. Develop a proposed framework for cooperation at the perimeter that could include:

## 1-3 Months

- NAPA Chrysanthemum White Rust (CWR) working group to be formed and tasked with delivery of pilot under the RCC
- 2. Working group to finalize:
  - a) joint work plan
  - b) identification of discrete deliverables and milestones.

#### 3-6 Months

- APHIS and CFIA to review the status and share within the working group each country's own current respective regulations and policies in the following areas:
- a) CWR eradication protocols
- b) CWR import restrictions.
- 2. APHIS and CFIA to establish a communications plan for working together on the regulatory oversight of CWR (and other chrysanthemum pests), including setting up monthly conference calls for information sharing and agreement on next steps.
- 3. In advance of publication of the ANPR, APHIS will host a stakeholder meeting to share information on CWR, including current industry practices and the current regulatory framework, to allow stakeholders to provide input on how best to safeguard the US industry from CWR. CFIA will be invited to participate in these discussions.
- 4. APHIS to publish an Advance Notice of

## 1-3 Months

- NAPA-Greenhouse certification program (GCP) working group to be formed and tasked with delivery of pilot.
- 2. Working group to finalize:
  - a) joint RCC work plan for revision of the GCP
  - b) identification of discrete deliverables and milestones.
- 3. Extend the current MOU to allow the US-Canada Greenhouse Certification Program to continue under the existing agreement pending revision of the program and finalization of the new bilateral agreement.

### 3-6 Months

- Identify and agree on key issues to be resolved to complete revision of the Greenhouse Certification Program to facilitate trade in low risk greenhouse plants between Canada and the USA.
- 2. Initiate a process to revise the CFIA-USDA Greenhouse Certification Program to address the key issues.

	a) Streamlining commodity certification processes, including electronic phytosanitary certification,     b) Common approaches to risk management and coordination of approaches to regulatory oversight	Proposed Rulemaking (ANPR) soliciting feedback from their stakeholders on the possibility of making changes to the regulatory status of CWR. CFIA to notify the Canadian industry of the proposed APHIS rulemaking so Canadian stakeholders can also provide feedback directly to APHIS.	
	<ul> <li>c) Collaborative import program development and alignment of import requirements</li> <li>d) Recognition of inspection requirements to include exploring the feasibility of interdiction activities at the first point/port of entry</li> <li>e) Development of joint standards and import control policies, including alignment of preclearance programs and off-shore mitigation and auditing</li> <li>f) Sharing of compliance results.</li> <li>4. Develop a plan that provides industry stakeholders with opportunity to engage Working Group leads quarterly or otherwise as agreed.</li> </ul>	5. CFIA to carry out similar consultations with the Canadian industry regarding the potential for making changes to the current regulatory status of CWR and involve APHIS in the consultative process.	
6-12 Months	<ol> <li>Review NAPA governance and establish mechanisms for ongoing bilateral engagement and lasting alignment, though leveraging and formalizing existing bilateral relationships dealing with either cross-commodity or pest-specific issues.</li> <li>Review relevance and prioritization of NAPA project list and their deliverables through the assessment of current bilateral priorities based on:         <ol> <li>current phyto-sanitary issues, including offshore threats, beyond the North American</li> </ol> </li> </ol>	<ol> <li>CFIA and APHIS to share with each other the results of their stakeholder consultations and based on stakeholder feedback, develop CWR regulatory options, identifying the expected potential regulatory impacts of each option.</li> <li>Based on stakeholder feedback, CFIA and APHIS work to develop and then share their own respective policy option / decision documents on CWR with a goal to minimize where ever possible any adverse impacts on trade between the two countries.</li> <li>APHIS and CFIA to develop responses to</li> </ol>	<ol> <li>Assess and agree on plant health related certification requirements for greenhouse plants and identify additional opportunities to streamline trade between Canada and USA</li> <li>Assess and agree on programmatic requirements for facilities that wish to participate in the greenhouse program</li> <li>Assess and agree on the requirements of CFIA and USDA for oversight of the greenhouse program</li> <li>Develop and implement a communications plan for consultation with stakeholders</li> </ol>

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	<ul><li>perimeter</li><li>b) Potential risks associated with emerging import trends from beyond the North</li></ul>	respective stakeholders regarding public comments on CWR regulatory status ANPR and CFIA stakeholder consultative process.	5.	Discuss and incorporate appropriate issues from stakeholders in order to finalize the program
	American perimeter  3. Stakeholder engagement as per communications plan	4. APHIS and CFIA work jointly to identify what other potential quarantine pests, if any, might affect chrysanthemums in other countries, and if appropriate, identify what regulatory actions might be needed to prevent their introduction.	6.	
		5. APHIS initiates publication of proposed changes to the US regulatory status for Chrysanthemum spp., if appropriate, for consideration by the public.		
		6. CFIA initiates the development of a Risk Management Document (RMD) regarding proposed changes to the Canadian regulatory status for Chrysanthemum spp if appropriate.		
		7. APHIS and CFIA to discuss how to develop a joint approach to managing the risks of other Chrysanthemum pests from third countries with a goal to reducing or eliminating the need for any quarantine restrictions on the movement of these plants between Canada and the United States.		
	Update NAPA project list to reflect priority projects, and develop forward workplan to include:	APHIS to finalize any changes to the CWR regulatory status, if appropriate, in the United States.	1.	Finalize the bilateral agreement, including an approved list of plants that will be authorized for shipment under the terms of the Greenhouse Certification Program
12-18 Months	a) identification of potential future pilot projects     to establish lasting mechanisms of ongoing     alignment in additional priority areas of focus	<ol><li>CFIA to publish and share the results of the CWR RMD.</li></ol>	2.	<b>G</b>
	Stakeholder engagement as per communications plan		3.	Initiate revision of internal USDA regulations and CFIA policy directives, as required

			4. Provide information and guidance to Canadian and US regulatory officials on programmatic changes for conducting audits
			5. Provide information and guidance for industry stakeholders on the programmatic changes to facilitate their transition to the revised program and enhance compliance.
Beyond 18 Months	<ol> <li>Beyond 18 months; continued broad focus of the NAPA initiative will be on equivalency of regulatory approaches and the identification of best instrument choice for the management of risks associated with plant pests/pathogens of mutual concern as well as continued sharing of compliance results.</li> <li>Stakeholder engagement as per communications plan</li> <li>Incorporate best practices from pilot projects particularly regarding governance model and processes in NAPA</li> </ol>	<ol> <li>Explore sharing of chrysanthemum import inspection results (imports from outside of North America) to facilitate joint import inspection targeting.</li> <li>Use lessons learned from the RCC-CWR project to inform the development of a Framework for a Canada-US Perimeter Approach to Plant Protection, as per Action Item 1 of the RCC Agriculture and Food Action Plan Initiation on Plant Protection, particularly with respect to governance model and processes.</li> </ol>	Implement the revised Greenhouse     Certification Program, allowing stakeholders time to transition to the new requirements
			2. Explore opportunities to integrate the currently separate greenhouse and nursery certification programs into one program
			3. Establish a permanent working group for oversight and continuous improvement of the Greenhouse Certification Program.
			4. Use lessons learned from the project to streamline the Greenhouse Certification Program to inform the development of a Framework for a Canada-US Perimeter Approach to Plant Protection, as per Action Item 1 of the RCC Agriculture and Food Action Plan Initiation on Plant Protection, particularly with respect to governance model and processes.

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