“A precursor to RBS: the U.S. National Agriculture Release Program”

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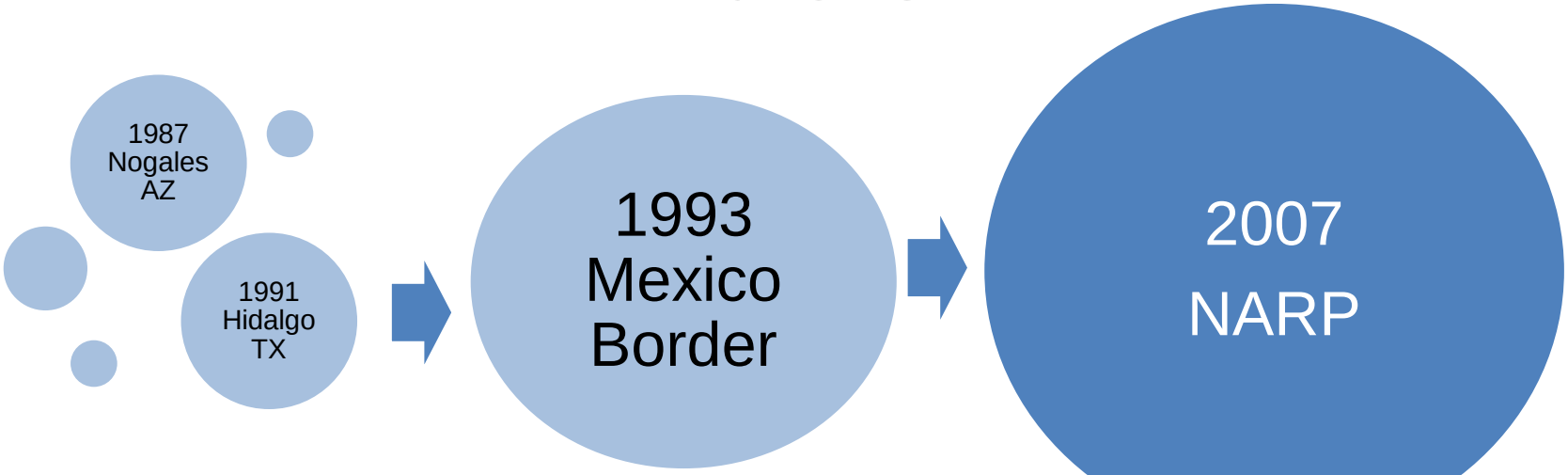
Risk Based Inspection in the U.S.

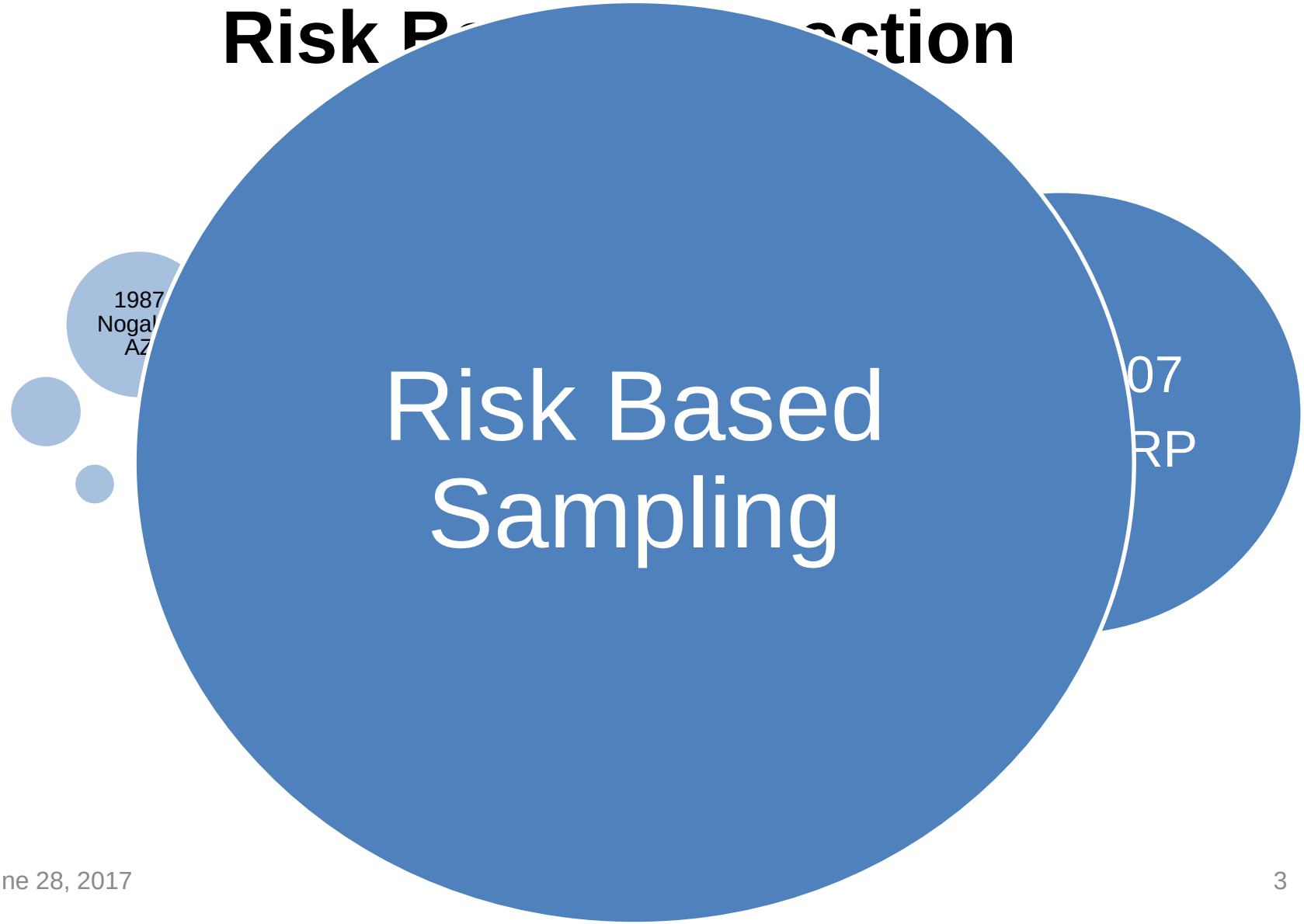


Single ports at border

Entire Border

All Ports

Risk B[illegible]ection



Today we'll cover:

- Highlights of the National Agriculture Release Program (NARP)
- Things to consider when creating a RBS or RBS-like program

What is NARP?

- A National Inspection Program
- Driven by inspection and pest data
- For fruits & vegetable imports only, with import histories of:
  - High volume
  - Low rates of quarantine pests
- Requires intense exams, but less frequent
- A science based program, not a trade program (i.e. not negotiable w/ trade partners)

Benefits of NARP (Win Win Win!)

TRADE: Less costs and less delays for agriculture inspection activities for fresh, frozen, and processed fruit and vegetable imports

CBP: More efficient utilization of Agriculture Specialists at ports of entry

APHIS PPQ: a defendable science based inspection program

How do we run the program?

There are three major components of NARP:

- Administrative (PPQ & CBP)
- Operational (CBP)
- Analytics (PPQ, assisted by CBP)

NARP Analytics

Analyses is performed once a year, quarterly, or as needed (ad-hoc), focusing on:

- Frequency of inspection

- Action rates

- Quarantine pests found

NARP Analytics

Frequency of inspection

- Are target frequencies being met nationally and at each local port?

- Are statistically valid samples sizes (e.g. inspections) being collected?

NARP Analytics

Action rates

- Document discrepancies
- Conveyance issues
- Wood Packing Material (ISPM 15) compliance
- Commodities themselves i.e. pests

NARP Analytics

Action rates (cont'd)

Q: How do different types of Action Rates fit in with RBS?

A: They may not, if RBS is only focused on inspections that result in quarantine pests. Any potential program might want to keep an eye on actions taken other than pests or you may lose sight of non-pest import issues.

NARP Analytics

Quarantine pests found

- Quantity
  - How many pests will you allow on a commodity that is inspected at a low frequency?
- Quality
  - i.e. pests of high economic importance

NARP Analytics

Quarantine pests found (cont'd)

Q: Is it important that we look at the *quality* of the pest in addition to the *quantity* of pests?

A: It might be! Not all pests created equal and some have larger impacts than others to the economy or the natural environment.

What should occur *before* setting up any sampling program:

Major areas of consideration:

- Data Quality flow
- Establishment of program criteria
- Training of Inspection workforce
- Data Analysis
- Communication and Cooperation
- Impact to Trade

Data Quality flow

- Inspection results and accurate details of shipment data are recorded in a timely fashion
- Inspection data should be readily accessible by data analysts and program managers.
- Ensure that inspection data is stored (and archived) in a reliable data management system that maintains the integrity of the data over time.

Establish program criteria

How can a commodity qualify for your program?

- Simple approach – apply the RBS inspection standard for all importations of the commodity and adjust the frequency (or intensity) of inspections according to known (identified) risks.
- Slightly complicated approach – use available inspection results to assign inspection frequencies commensurate to known (identified) risks
  - e.g. 1 out of 10 shipments, 1 out of 50 shipments, etc.

Establishing program criteria (cont'd)

Q: What happens if I only have non-hypergeometric data to look at?

A: That's fine, it worked for us, but it is important to consider that the inspection technique will change as soon as you implement a RBS program and managing two kinds of data can be tricky!

Q: Should I start collecting hypergeometric data *before* lowering the inspection frequency?

A: You will have to decide this - the decision may be grounded in what inspection/pest data you have available and how confident you are about that data reflecting the true pest population and import volume in the pathway.

Training of Inspection Workforce

Train the inspection workforce so they understand the principles of RBS, such as

- » True *random* sampling
- » Inspecting the number of boxes as required
- » Reporting of all pests found
- » Enter inspection data punctually and accurately

Make written program guidelines available

Make sure inspectors know *how* to find pests!

Data analysis

Establish and document a method to use to perform data analysis, which includes:

- A plan to analyze program data at certain intervals
- A system of data analysis that is performed in a consistent manner *that can be repeated*

Secure data analyst resources that can be dedicated *over the long term* to support the RBS program

Communication & Cooperation

Between the NPPO and the Agency performing inspections (if different)

Between the NPPO and the inspectors (Operations)

- Feedback about the program from the field should be sought out

Between program administrators and analysts

- Likely these are different people, with different backgrounds.
- Both parties need to understand each other and speak the same language

Between the NPPO and Trade/Industry

Impact to Trade

Due to the effort and logistics involved to support a hypergeometric based RBS program, there will be affects to Trade, in the form of costs and delays.

Before moving forward with any inspection program, it is critical to consider the *impact* to Trade and make an effort to find the right balance between protection and legal safe Trade.

Successful RBS:

Good Design

Contingency plans in place

Commitment

Conclusion

PPQ is looking forward to applying knowledge and lessons learned as we move forward with RBS in the CBP cargo environment.

If we can be of further assistance in the design or implementation of a RBS or RBS-like inspection program, please let us know!

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