

EXPORT CERTIFICATION POLICY AND PROTOCOL FOR EXPORTERS



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INTRODUCTION

The Entomology Program of the Nebraska Department of Agriculture (NDA), Animal and Plant Health Protection (APHP) helps facilitate the export of plants and plant products by inspecting and certifying the shipments for interstate and international markets. This is done by issuing phytosanitary export certificates, which are official documents that verify a commodity has been inspected by an authorized official and meets the export requirements. These phytosanitary certificates are required by many foreign countries and states in order to import plant and plant products into their region. The certification procedure may require: inspection of plants growing in the field, inspection of the commodities after harvest, surveys of certain areas for specific plant pests, and/or laboratory testing. Inspections and surveys may be conducted for insects, nematodes, plant disease, weeds/weed seed, soil and other foreign material. This information is then used to verify that the shipment meets the entry requirements of the receiving state or country.

NDA receives applications for export certificates on a daily basis. Applications are reviewed for completeness, and to determine if the shipment meets the entry requirements, then the proper export certificate is issued.

TYPES OF EXPORT CERTIFICATES

There are different types of export certificates issued depending on the plant product, where it is being exported, and its origin.

- Form 577 – For U.S. origin commodities going to a foreign consignee or a foreign origin commodity lacking an original foreign phytosanitary certificate.
- Form 578 – For certifying processed plant products.
- Form 579 – For foreign origin commodities re-exported from the U.S. to a foreign consignee that has an original foreign phytosanitary certificate.
- State certificate – For interstate movement of commodities.

FIELD STAFF DUTIES

Inspectors with the APHP program are located statewide. They conduct inspections, do surveys and take official samples.

OFFICE STAFF DUTIES

Export Certification Coordinator:

- Reviews current foreign requirements.
- Maintains records of exporting firm inspections.
- Reviews regulations, applications and import permits for export certificates.
- Issues and signs federal phytosanitary certificates, state phytosanitary certificates, and re-export certificates attesting to compliance.
- Bills firms on a monthly basis for inspections and certificates issued.
- Supervises Nebraska Crop Improvement Association (NCIA) growing season field inspection program.

State Entomologist/Program Manager:

- Administers the plant and plant product export program.
- Issues certificates when the Export Certification Coordinator is out.

POLICIES AND REGULATIONS

FOREIGN REGULATIONS

Export certification requirements are those of the foreign importing countries, not NDA requirements. Each country has its own unique and dynamic regulations for the importation of plants and plant products. In order to issue a certificate, our staff electronically accesses a USDA database called PEXD, which contains the current regulations of over 200 countries for U.S. origin products to determine if the foreign country's requirements can be met.

If a commodity is from a foreign country and not of U.S. origin, then the information on PEXD cannot be used to determine the requirements of importing country. The applicant must supply NDA with the importing country's requirements for that foreign product in order to have an export certificate issued. This can be done with either an import permit or official documentation from the country that lists the requirements.

EXPORT CERTIFICATE ISSUANCE POLICY

NDA issues over 4,000 phytosanitary certificates a year. The timely issuance of certificates is a priority to us. We will try to issue and send out certificates for all complete applications received before 12:00 p.m. (CST) that same day. However, incomplete applications, uninspected commodities, or foreign export requirements may delay issuance of the export certificate.

FEES

For federal phytosanitary certificates issued by NDA, there is a NDA certificate fee and a USDA user fee assessed for each certificate. State phytosanitary certificates are only charged the NDA certificate fee. For any inspections, official sampling or treatment witnessing done by NDA staff at the firm site, there is an inspection fee based on time and mileage. Invoice statements are sent out to firms each month for their charges.

PCIT

PCIT stands for **Phytosanitary Certificate Issuance and Tracking System**, which is a web-based system allowing applicants to enter their applications on-line, to be reviewed

and completed by the issuing office (duty station). An original is printed, signed and sent out by our office, and applicants can print copies directly from the web site, as needed. Use of PCIT is not currently mandatory, though we encourage its use as this system makes the issuance process more efficient and accurate. For more information on PCIT, visit the PCIT web site at <https://pcit.aphis.usda.gov/pcit> and follow the links for new users.

EXPORT CERTIFICATE MAILING POLICY

NDA will mail the original certificate via First-Class mail or Express mail service (provided we have the firm's account number for billing). We will not fax copies of certificates or send copies to multiple locations.

INSPECTION POLICY

In order for an export certificate to be issued, the commodity being shipped must be inspected, generally by either an NDA inspector or an Federal Grain Inspection Service (FGIS) official. Commodities are inspected for stored grain insects and other requirements, such as the presence of soil peds, foreign material and weed seeds, depending on specific country requirements.

While there is some variation between countries, USDA requires that an inspection occur no longer than 30 days prior to issuance of the phytosanitary certificate. Some countries have windows as short as 14 days. Others specify the time length between inspection and shipment date. Shipment date is the date when the commodity leaves the country, NOT when the commodity leaves the firm location. Inspections that are beyond the 30-day window are no longer valid, and the commodity will need to be reinspected before an export certificate can be issued.

STANDARDS FOR LIVE STORED GRAIN INSECTS

NDA would like to see zero live stored grain insects during inspections of commodities for export. However, according to the USDA Export Services *Export Certification Manual*, if any pests found during the inspection are not listed in the receiving country's export summary as being quarantine significant, then the insect infestation level should not exceed a 2% infestation level. For quarantine significant pests, there is a zero-tolerance policy.

If the allowable insect infestation level is exceeded, the infested commodity must be treated and re-inspected before it will be certified for export. The treatment must be documented by the exporting firm on forms provided by this office.

RAIL CARS AND CONTAINERS

It is important that rail cars and containers are cleaned out before loading, to prevent shipments from being rejected or held on arrival due to debris.

SOIL CONTAMINATION

Some countries are very concerned about the movement of soil or soil peds with seed and grain (example: dry beans to Mexico). Nematodes and some plant diseases can be

moved in soil. In the case of dry bean shipments to Mexico, the inspector must inspect the dry beans after they have been cleaned and document on the inspection report that no soil pedes were found. If soil is found, the commodity will need to be cleaned and reinspected.

APPLYING FOR AN EXPORT CERTIFICATE

COMPLETING AN APPLICATION

Applications may be submitted through PCIT, or by fax or e-mail. If using PCIT, you must designate *NE: Lincoln (state)* as the duty station. Non-PCIT applications can be faxed to (402) 471-6892, or e-mailed to agr.phyto@nebraska.gov. A copy of the "Export Certificate Application" can be found on the NDA web site at www.nda.nebraska.gov.

In addition to the application, other items may need to be submitted in order to meet export requirements. These may include Import Permits and translations, field inspection reports, lab reports, FGIS inspection reports, and treatment verification forms.

IMPORT PERMITS

Import permits are issued by the importing country's ministry or department of agriculture, to the foreign buyer. These permits grant permission to import into the country and list requirements for the product to be imported. It is the responsibility of the importer or broker to provide the exporter with a copy of the original import permit and, if necessary, a full and complete English translation. If an import permit is required, a copy of the import permit and translation must be presented to this office before the phytosanitary certificate can be issued.

GROWING SEASON FIELD INSPECTIONS

Growing season field inspections of seed fields are conducted at least once per year by NDA or NCIA under the direction of NDA. NDA inspects corn seed research fields, and research and commercial fields of all other seed crops, while NCIA inspects the commercial corn seed production fields. Firms are responsible for applying for these inspections, maintaining copies of all field inspection reports, and submitting a copy of these reports with the phytosanitary application, when needed. The report must indicate which field(s) the seed was produced in. These reports are used for the basis of export certification.

LAB SAMPLES

Laboratory testing of the seed is an alternate method for verifying presence or absence of plant diseases and may also be necessary in order to meet export requirements. Official samples must be drawn by NDA inspectors for plant disease lab testing at Iowa State University (ISU). Samples drawn and submitted solely by the firm are not eligible for use in export certification. Depending on the testing needed, and the workload at ISU, it may take several weeks to receive test results. The sample will be sealed by the inspector and given to the firm to submit to:

ISU Seed Testing Laboratory
109 Seed Science Center
Iowa State University
Ames, IA 50011

Phone: (515) 294-6826
Fax: (515) 294-8303
e-mail: seedlab@iastate.edu
web site: <http://www.seeds.iastate.edu/seedtest/index.html>

Contact ISU for more information on testing time, quantities needed and lab fees.

FGIS INSPECTION REPORTS

If FGIS conducts the phytosanitary inspection, then the applicant must submit a copy of a completed FGIS 921-2 form. This form is completed by FGIS at the time of the phytosanitary inspection, must be filled out completely, and signed by the inspector. Declarations of inspection on company letterhead, or on any other FGIS forms, are not acceptable as documentation for export certification purposes.

FUMIGATION AND SEED TREATMENTS

Fumigation or seed treatments that are required by the importing country need to be stated on the phytosanitary certificate. To do this, the applicant must complete a Treatment Verification Form, available from NDA. Treatments may also need to be fully witnessed and verified by NDA staff, depending on the importing country's requirements, the type of pesticide used, or the information listed on an import permit. If an official treatment witnessing is required, the firm must contact the office prior to treatment to set up a time and verify that all requirements are being met.

EXPORTER CATEGORIES

Firms or individuals exporting plants and plant products have been divided into categories or types in order to establish inspection protocols. NDA inspectors have the discretion to modify their inspection approaches, if necessary, and approved by this office. It is important that the proper level of oversight exists to assure that plants and plant products meet export requirements. The exporter categories are:

- Bulk Grain (corn, wheat, soybeans, popcorn, dry beans, sorghum, etc.)
- Commercial and Research Seed (corn, sorghum, soybean, wheat, popcorn seed, etc.)
- Processed Plant Products (animal feed with additives, pressure-treated wood)
- Semi-Processed Plant Products (pellets, hay, flour and other milled products)
- Individual (one time or periodic shipments)
- Plants and Nursery Stock (field- and greenhouse-grown plants)
- Potatoes (Commercial and seed potatoes)

BULK GRAIN INSPECTION PROTOCOL

Firms exporting bulk grain need to maintain a certain level of facility cleanliness which will ensure that grain in storage is protected from birds, excessive moisture, mold, rodents, and stored grain insects. The facility should have a management program which will monitor grain conditions. The firm should have a pest management program for birds, rodents, and stored grain insects.

Some firms may not have enough storage space available, so additional storage locations may need to be inspected. Firms may load grain directly from farm storage. These locations must be inspected before export. Inspectors must indicate these additional storage locations on their inspection reports.

- Phytosanitary inspections of grain will need to be conducted every 30 days at firms currently exporting, and possibly more often depending on the export countries. NDA inspectors will conduct these phytosanitary inspections, unless the firm is utilizing FGIS inspections (FGIS contact information is found towards the end of this document; contact them for locations that certify dry beans and popcorn) as a basis for certification.
- Only the grain that has been inspected is eligible for export certification.
- If the firm doesn't export year round, the inspector will work this out with each firm as to how often they need them there to inspect.
- Khapra beetle surveys may be conducted to verify to absence of this pest in the state for export certification.
- Moisture testing of popcorn may be required. Samples must be drawn by FGIS contract samplers.
- Pop and volume testing of popcorn is usually done by the exporting firm. A buyer may require an official test which has to be sampled by FGIS contract samples.
- Firm pesticide application records may be audited.

COMMERCIAL AND RESEARCH SEED INSPECTION PROTOCOL

Commercial seed companies grow thousands of acres of seed in Nebraska. Firms exporting seed need to maintain a certain level of facility cleanliness which will ensure that seed in storage is protected from birds, excessive moisture, mold, rodents, and stored grain insects. The facility should have a pest management program.

- Phytosanitary inspections of seed will need to be conducted every 30 days at firms currently exporting, and possibly more often depending on the export countries. NDA inspectors will conduct these phytosanitary inspections.
- Only the seed lots that have been inspected are eligible for export certification.
- If the firm doesn't export year round, the inspector will work this out with each firm as to how often they need them there to inspect.
- Khapra beetle surveys may be conducted to verify to absence of this pest in the state for export certification.
- Official samples may be officially drawn by NDA inspectors for plant disease laboratory testing at ISU as assigned. The inspector can do a phytosanitary inspection at the time the official sample is drawn. However, if it takes greater than 30 days for the lab results and an application to be submitted, another inspection will be necessary. Only samples pulled by NDA inspectors can be used for export certification.
- Samples may be taken for Federal Seed Analysis Certificates and sent to the Federal Seed Laboratory in Beltsville, Maryland.
- Growing season field inspections are conducted at least once per year by NDA or NCIA under the direction of NDA. Inspection reports are sent to each firm, and must be submitted as part of the export application, as needed. These reports are used for the basis of export certification.

- Special surveys are conducted as necessary, which may involve soil sampling for nematodes or surveys of specific areas for plant diseases and insects.
- Firm pesticide application records may be audited.

PROCESSED PLANT PRODUCTS INSPECTION PROTOCOL

Processed products are plant products that are highly processed in some manner. They can be issued a Processed Product certificate (578 Certificate), if they are listed as eligible products by USDA. In general, milled products including flours, meals, and grits are not eligible for a Processed Product Certificate, they are only eligible for a Phytosanitary Certificate (577).

Firms exporting processed products need to maintain a certain level of facility cleanliness that will ensure that the product in storage is protected from birds, excessive moisture, mold, rodents, and stored grain insects. The firm should have a pest management program for birds, stored grain insects, and rodents. Warehouses should be in good sanitary condition. The FDA may be inspecting some of these facilities.

- If the exporter is applying for a Processed Product Export Certificate, then no phytosanitary inspection is required, though it is suggested.
- Samples of processed products are maintained in the quality control laboratory at each firm. The product samples are kept on file for 30 to 60 days. The inspector can inspect these samples as a basis for Processed Product certification (Form 578). These samples cannot be inspected for certification with a Phytosanitary Certificate (577).
- Bagged product or large commodities can be sampled in the warehouse.
- Khapra beetle surveys may be conducted to verify to absence of this pest in the state for export certification.

SEMI-PROCESSED PLANT PRODUCTS INSPECTION PROTOCOL

Semi-processed bulk and bagged plant products include products such as hay and pellets and milled products such as flour, meal, and grits. The plant products are usually screened, scalped, electric-eye separated, or cleaned in some manner.

Firms exporting semi-processed products need to maintain a certain level of facility cleanliness that will ensure that product in the storage is protected from birds, excessive moisture, mold, rodents, and stored grain insects. The facility should have a pest management program for birds, stored grain insects, and rodents. Warehouses should be maintained in good sanitary condition.

- Phytosanitary inspections will need to be conducted every 30 days at firms currently exporting, and possibly more often depending on the export countries. NDA inspectors will conduct these phytosanitary inspections, unless the firm is utilizing FGIS inspections (FGIS contact information is found towards the end of this document) as a basis for certification.
- Only the products that have been inspected are eligible for export certification.
- If the firm doesn't export year round, the inspector will work this out with each firm as to how often they need them there to inspect.
- Khapra beetle surveys may be conducted to verify the absence of this pest in the state for export certification.

- Firm pesticide application records may be audited.

INDIVIDUAL (ONE TIME OR PERIODIC SHIPMENTS) INSPECTION PROTOCOL

For firms that do not ship on a regular basis, their inspections are done on an “as needed” basis. Firms need to contact the office or the inspector to schedule these inspections.

- Khapra beetle surveys may be conducted to verify to absence of this pest in the state for export certification.
- Firm pesticide application records may be audited.

PLANTS AND NURSERY STOCK INSPECTION PROTOCOL

These inspections will be conducted by the nursery program staff.

- The inspections may be done during the firm’s yearly nursery inspection or may require an additional inspection of the specific plants in the shipment. Contact the office to schedule these inspections.
- Special surveys are conducted as necessary, which may involve soil sampling or surveying of specific areas for plant diseases, nematodes, and insects.

POTATOES (TABLESTOCK AND SEED POTATOES) INSPECTION PROTOCOL

Potato inspections are conducted by staff with the NDA Potato Development and Nebraska Potato Certification Association.

- Special surveys are conducted as necessary, which may involve soil sampling or surveying of specific areas for plant diseases, nematodes and insects.

FGIS GRAIN GRADING PROCEDURE FOR EXPORT

In Nebraska, USDA, Grain Inspection, Packers and Stockyards Administration (GIPSA), FGIS, has subcontracted with private firms to do the grain grading. The FGIS regional offices located in Cedar Rapids, Kansas City, or Wichita, maintain oversight of the contracted regional grain inspection stations. When an elevator requests a grade certificate for export, a regional grain inspection station is contacted. The regional inspection station sends an inspector to either monitor the mechanical diverter as the rail cars are loaded or probe individual rail cars. A sample of approximately five pounds is collected from each rail car loaded. The samples are then taken to the inspection station for grading. When the samples arrive at the regional grain inspection office they are split into two parts: a work portion and a file sample. The work sample is examined for foreign material, live insects, moisture, mold, odor, and weight. An index card called a "pan ticket" is filled out with the information necessary for grading, including the number of live stored grain insects found. The file sample is examined only if live insects are found in the work sample. This pan ticket is kept with the file sample in the office for 30 days. An Official Export Grain Inspection Certificate is issued for each rail car.

Some export shipments may be graded by method called Cumulative Summary (Cu Sum) where samples and grades are averaged for five rail car lots. The individual rail car samples are first tested for the presence of live stored grain insects and the number found are listed on a log sheet. The grain is then graded by lot and one certificate is issued with an attachment listing all the cars in the unit train.

FGIS or the exporting firm must submit a complete FGIS 921-2 form as part of their application for an export certificate. No other FGIS documents can be used to certify exports.

FGIS INSECT INFESTATION STANDARDS¹

USDA, FGIS standards allow a tolerance for live stored grain insects. A grain sample is not graded infested or weevilly, unless a certain number of live stored grain insects are found. If live stored grain insects are found in a sample, the number and category of insect are recorded on a pan ticket. The grade certificate will then be issued with no mention of live stored grain insects, if that number falls under the established tolerance. FGIS divides the stored grain insects into two categories. Live weevils (lw) include cowpea weevils, granary weevils, maize weevils, rice weevils and lesser grain borers. The other category is other live insects injurious to stored grain (oli) commonly called "bran bugs." This category includes grain beetles, grain moths and larvae. The grain beetles include at least 18 species of beetles; those most frequently found in Nebraska are confused flour beetles, flat grain beetles, merchant grain beetles, red flour beetles, rusty grain beetles, and saw toothed grain beetles. The grain moths include six species; those most commonly found are angoumois grain moths and Indian meal moths.

¹Grain Inspection Handbook - Book II, Grain Grading Procedures, USDA, FGIS

The standards for grading a sample "Infested" or "Weevilly" are as follows:

- Two or more live weevils are found (or)
- One live weevil and five other live insects injurious to stored grain (or)
- Ten other live insects injurious to stored grain

If a sample is found to be infested, the firm may fumigate that rail car or reload it. The firm then sends a letter to the regional grain inspection office attesting that the rail car has been fumigated in accordance with the label. Phosphine is the fumigant of choice.

INSPECTION OF RAIL CARS AND CONTAINERS BEFORE LOADING

FGIS inspectors look at the inside of the rail car or container before loading to check for old grain, soil, or other debris. The inside of the rail cars and containers must be clean before loading, to prevent shipments from being rejected due to debris.

AFLATOXIN, VOMITOXIN, ZEARALENONE, FUMONSIN TESTING

Aflatoxin or other toxin testing may be requested by some buyers. The testing is not a phytosanitary requirement of the foreign countries. Statements concerning aflatoxin testing are not allowed on the phytosanitary certificate. Samples must be drawn by inspectors from the regional grain inspection service. The regional inspection stations then run the tests.

Aflatoxin testing for popcorn is different. FGIS contract samplers must pull the samples. The samples are sent to the FGIS Technical Services Division Laboratory in Kansas City, Missouri, for testing. A FGIS Commodity Inspection Certificate is then issued listing the level of aflatoxin. The aflatoxin tolerance in grain and popcorn ranges from 10 to 20 parts per billion (ppb). Vomitoxin tolerance are 2 parts per million (ppm).

GRADE CERTIFICATES FOR DRY BEANS AND SPECIALITY CROPS

Grade certificates can be issued for great northern beans, pinto beans, popcorn, confectionery sunflowers, and other specialty crops if requested. FGIS contracted samplers must sample the commodity and send the sample to FGIS regional office. An FGIS Commodity Inspection Certificate would be issued by FGIS regional office.

POP AND VOLUME TESTING

Most popcorn pop and volume tests are done by the exporting firms. Sometimes buyers require an official certificate for pop and volume on an Agriculture Marketing Service (AMS) certificate. FGIS contracted samplers must pull the samples. The samples must then be sent to the USDA, FGIS, Technical Services Division Laboratory at Kansas City, Missouri.

POPCORN MOISTURE TESTING

To test for popcorn moisture content, a sample must be drawn by FGIS contract samplers. The sample is tested at FGIS in Cedar Rapids, Kansas City or Wichita. An FGIS Commodity Inspection Certificate is issued listing the moisture percentage and foreign material.

USDA, GIPSA, FGIS REGIONAL INSPECTION STATIONS

Three USDA, GIPSA, FGIS regional field offices have jurisdiction over the subcontracted regional grain inspection stations in Nebraska. The FGIS Cedar Rapids office has the Sioux City office. The FGIS Kansas City office has the Fremont, Lincoln and Omaha offices. The FGIS Wichita office has the Grand Island, Hastings, and Sidney offices.

Location	Address	Phone/Fax number
CEDAR RAPIDS, IOWA	USDA, GIPSA, FGIS P.O. Box 74855 Cedar Rapids, IA 52406	(319) 841-9210 (319) 841-9213
KANSAS CITY, MISSOURI	USDA, GIPSA, FGIS 7084 Universal Avenue Kansas City, MO 64120	(816) 241-4031 (816) 241-4071
WICHITA, KANSAS	USDA, GIPSA, FGIS 7920 W. Kellogg Drive, Suite 200 Wichita, KS 67209-2006	(316) 722-6370 (316) 722-1780
KANSAS CITY, MISSOURI	Technical Services Division USDA, GIPSA, FGIS 10383 Ambassador Drive Kansas City, MO 64153-1394	(816) 891-0401 (816) 872-1258

USDA, Agricultural Marketing Service (AMS) administrates the Agricultural Marketing Act and Federal Seed Act and issues Federal Seed Analysis Certificates.

BELTSVILLE, MARYLAND	USDA, AMS Federal Seed Lab Seed Regulatory and Testing Branch Building 306, Room 209 BARC-East Beltsville, MD 20705	(301) 504-8089 (301) 504-8098
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NEBRASKA REGIONAL GRAIN INSPECTION STATIONS

Seven grain inspection stations are subcontracted with FGIS to grade grain in Nebraska.

Location	Address	Phone/Fax/Email
FREMONT	Dave J. Reeder, Manager Fremont Grain Inspection Department 603 East Dodge Street Fremont, NE 68025	(402) 721-1270 (402) 721-5086 fgid@neb.rr.com
GRAND ISLAND	Ted P. Hoelck, Chief Inspector Hastings Grain Inspection, Inc. 315 South Locust Street Grand Island, NE 68801	(308) 384-2174 (308) 384-4750 hginsp@inebraska.com
HASTINGS	Greg Hoelck, Chief Inspector Hastings Grain Inspection, Inc. 306 East Park Street Hastings, NE 68901	(402) 462-4254 (402) 462-4100 hgihast@charterinte rnet.com
LINCOLN	Mark Fulmer, President Lincoln Inspection Service, Inc. 505 Garfield Street Lincoln, NE 68502	(402) 435-4386 (402) 435-4389 lismf@neb.rr.com
OMAHA	Bruce Probst, Vice President Omaha Grain Inspection Service 2525 South 13th Street Omaha, NE 68108-1521	(402) 341-6739 (402) 341-3662 beprobst@ogis.biz
SIDNEY	Terry Osborn, Field Office Manager Kansas Grain Inspection 517 - 13th Avenue Sidney, NE 69162	(308) 254-3975 (308) 254-2782 dengrain@hamilton.net
SIOUX CITY, IOWA	Tom Dahl, Chief Inspector Sioux City Insp. and Weighing Service 840 Clark Street Sioux City, IA 51101	(712) 255-8073 (712) 255-0959 tomd@scigrain.com