



Challenges for Issuing Phytosanitary Certificates
Hotel Murano 1320 Broadway St. Tacoma, WA
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“WSDA Seed Program is committed to providing services of the highest possible standards, to satisfy customer needs and expectations of accurate, timely and quality testing, inspections and reporting. The program is also committed to continual improvements for effectiveness and success of our stakeholders and the program.”

- **WSDA Seed Program Structure**
 - New Management August, 2019
 - Two staff issue phytosanitary certificates: Ramona Vickers & Karri Doescher
 - Seven ACO signers for phytosanitary certificates
 - Four staff in various stages of training for proposed ACO exam in 2020
 - We request 48-hours to start an application for review
- **Statistical summary, 6 year average:**
 - 7,844 average seed samples to laboratory annually
 - 27 state phytosanitary certificates issued annually
 - 1296 federal phytosanitary certificates issued annually
 - 869 re-export federal phytosanitary certificates issued annually
 - 33,692 acres phytosanitary fields inspected during active growing season
 - Inspection criteria established by applicant for specific nematode, pest or disease called a ‘Plan Code’
 - 47,934,691.58 pounds of large seeds visually inspected in 2018
- **Seed Program Challenges for Issuing Phytosanitary Certificates**
 - Lack of understanding of our role in issuing certificates
 - PExD are not WSDA rules or guidelines
 - WSDA is acting as an agent for USDA under a MOU
 - Standards for list of harmful organisms by country is not a WSDA list
 - Consequences of failing to follow the guidelines is loss or temporary suspension of our ACO signature authority
 - Attachments to applications are incomplete
 - Wrong supporting documents or items are attached
 - Information provided is too old
 - E-mails are attached to the application
 - not allowed as supporting documentation
 - Provide too much information to filter down to the correct lot numbers by shipment (more information is not always better)
 - Components missing for what nematode/pest/disease to inspect for in a field during the active growing season
 - Post field inspection time, we are asked to ‘just add’ a nematode/pest/disease because “we all know it is not there” .
 - The non-daily requestors have a poor response time when more information is needed to complete the application
 - Most common reason for rejection is missing information

- Requestor looks up the wrong type of commodity and provides incorrect information for application
(Example: looks up grain vs seed requirements. Requirements were not looked up within the last year and provided documents for the old requirements.)
- Request our staff to look up lab or field reports and asked to attach to application
 - We are the reviewers only and are not to modify the application
- Lab or field report lot numbers do not match the application lot numbers
- Field reports provided by other states are not always clear on what was inspected for a nematode/pest/disease; missing pages or otherwise missing a final signature
- Commonly asked for a seed health test to replace a positive finding on a field inspection report
- Lack of PExD knowledge to find current requirements and list of harmful organisms
- Lack of knowledge on which laboratories are approved by USDA for official seed health reports to use as documentation to issue Federal Phytosanitary Certificate
- Vocabulary barrier:
 - Lab reports referred to a phytosanitary certificate or certificate of analysis
 - Field reports referred to as phytosanitary field certificate or certificate of analysis
 - Only one phytosanitary certificate which is issued after a review of provided documents
- **Program Housekeeping**
 - Agency webpage changed in May 2019, new URL directions:
<https://agr.wa.gov/services/inspections-and-investigations/inspections/seed>
 - Notice from our agency on changes to EU requirements for export:
<https://agr.wa.gov/services/exports/inspections>
 - January 2020 plan to launch a universal email for communication for phytosanitary certificates: AGR MI Seed Phytos seedphytos@agr.wa.gov
 - Currently under a budget review, anticipate an increase in fees for services to announce for rule revision process.
 - Seed Advisory Committee recently reorganized and established regular meetings.
 - Revamping WA Seed Regulatory program with an educational campaign to industry.

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Thank you for your interest!
