

Plant Importation ¹

Alan W. Meerow²

Florida nurseries are increasingly turning to offshore producers as sources of propagation material of a number of foliage plant species. Other nursery operators may at times wish to bring seed or vegetative material of plants encountered during travels abroad or from overseas catalogs into the country for trial and evaluation.

The United States Department of Agriculture (USDA) has a well-defined program for facilitating the legal import of plant material into the country. This fact sheet describes how to obtain a plant import permit, how to prepare plant material for importation, methods of importation, special rules and regulations governing the type of plants that may be imported, Customs requirements, and the special handling that imported material must undergo both prior to and after it is shipped.

Importations Not Requiring an Import Permit

A limited amount of plant material is allowed into the country from a foreign source without an official plant import permit. Less than 12 units of any unrestricted species can be brought in as baggage or through the mail without obtaining a written permit.

Seed of unrestricted herbaceous species (flowers, field crops, vegetables) can be imported without a written permit. Seeds of woody plants require an import permit. This does not, however, free the importer from the obligation to have such material inspected by the Plant Protection and Quarantine inspection service, and it must be declared when passing through Customs.

Obtaining an Import Permit

Plant importation is regulated by a unit of the USDA called the Animal and Plant Health Inspection Service (APHIS) based in Hyattsville, Maryland. The first step for any prospective plant importer is to write directly to APHIS (Permit Unit, Plant Protection and Quarantine Programs, Animal and Plant Health Inspection Service, U.S. Department of Agriculture, Federal Building, Hyattsville, MD 20782), and request an application for a plant import permit. A short form will be sent to you on which you are requested to list the plant material intended for import (genera and/or species; type of material, that is whether rooted or unrooted cuttings, whole plants, etc.). USDA does not charge for obtaining a plant import permit (but see section below on trade in endangered species).

1. This document is ENH76, one of a series of the Environmental Horticulture Department, Florida Cooperative Extension Service, Institute of Food and Agricultural Sciences, University of Florida. Original publication date July 1989. Reviewed October 1 2003. Visit the EDIS Web Site at <http://edis.ifas.ufl.edu>.

2. Alan W. Meerow, Assistant Professor, Tropical Ornamentals Specialist, IFAS, Fort Lauderdale Research and Education Center, Cooperative Extension Service, Institute of Food and Agricultural Sciences, University of Florida, Gainesville, 32611.

Within a few weeks after sending back a completed application, you will receive a packet from USDA containing the following material:

- an import permit good for 5 years, after which time it must be renewed
- five green and yellow mailing stickers imprinted with your permit number and the address of the Plant Protection and Quarantine (PPQ) inspection station nearest to your address (Table 1). These labels are used only with mail shipments of imported plant material.
- import rules and regulations
- a list of plants protected under the Convention on International Trade in Endangered Species (CITES)
- a list of plants considered noxious weeds and therefore prohibited from entry
- one or more lists of plants whose import is prohibited or restricted because of disease and/or insect problems or which must be subjected to monitored postentry quarantine for a period of time
- a list of plant genera **not** subject to postentry quarantine.

Preparing Plant Material for Import

It is important that the person, agency, or business from which you will be receiving material follow certain guidelines in preparing plant material for export to the United States. Failure to comply with these rules may result in the refusal of entry to your plant material.

- All plant material must be clean and free of sand, soil, or leafmold. Rooted material must be **bareroot** ; that is, in general there should be no residue of the medium in which the plant was grown left on the roots. This may be true even if the plants were grown in "sterile" media such as vermiculite or perlite. Certain exceptions are made to this rule and are detailed in the regulations booklet which accompanies your plant import permit. For example, epiphytic

orchids established on tree fern slabs, coconut husks or coconut fiber may be imported on this media.

- Plants must be packed in approved materials only. Some common approved materials include ground peat, sphagnum, pulp-free vegetable fibers such as coconut (NOTE: sugarcane and cotton are prohibited), osmunda fern, woodwool (excelsior), wood shavings, sawdust, cork, buckwheat hulls, and vermiculite.
- Any wrapping or coating on the plant material that interferes with inspection or treatment may cause entry refusal.

Size-age limitations. In general, plants cannot be more than two years of age from propagation. Certain slow-growing genera (**Rhododendron** , for example) are allowed a third year. Dwarf or miniature forms of woody plants less than 12 inches tall (measured from the soil line) and bonsai are exempt from this rule. Cactus cuttings may not be over 6 inches in diameter and 4 feet in length. Cacti, cycads, vuccas, agaves, dracaenas, and palms may not be taller than 18 inches measured from the soil line to the furthest terminal growing point. Cane cuttings without leaves, roots, or branches (for example, *Dracaena fragrans massangeana*) cannot be over 4 inches in diameter and 6 feet long. Herbaceous perennials shipped in the form of root crowns or clumps cannot be more than 4 inches in diameter.

- Certain species from tropical sources must be defoliated before or upon entry.
- All material must be labelled to genus, species and variety (if applicable). If scientific names are not available, a well-known English common name may be sufficient.

Invoices . For cargo importations, APHIS requires that a copy of the invoice be filed when entry through Customs is made. Additionally, a packing list must be placed in each container or a copy of the invoice placed in container number one. These invoice copies are in addition to those required by other agencies or individuals (e.g, Customs, a broker, yourself). If the plants are being mailed, one copy of the invoice must be placed inside at least one of the

packages. Mark the appropriate package "Invoice Enclosed" where it can be seen easily.

Phytosanitary Certificate . It is essential that imported plant material be certified by the proper plant inspection agency in the country of origin, and a phytosanitary certificate issued. For cargo importations, the original of the phytosanitary certificate must be attached to the Customs entry documentation. A copy of the certificate may also be affixed to each container. If importing by mail, the original certificate must be enclosed in one of the packages, and a copy attached to the outside of each.

Importing Methods

Importing by mail . Plants may be sent to the United States by letter post, parcel post, air parcel post, and other classes of mail. Unlike some other means of shipment, a bonded carrier (broker) is **not** needed to deliver the material to an APHIS inspection center. Overall, mail shipment does provide for a less complicated movement of the material from its point of origin to its final destination, but it can be very costly for large shipments. Reliability and other characteristics of air parcel post may differ from country to country. For example, some types of air parcel post revert to surface transport as soon as the material arrives in the United States; other types maintain air movement of the material all the way to its final destination. It is best to consult your foreign exporter as to the best class of mail shipment to use. Letter rate airmail (air all the way from point of origin to destination) may be useful for small packages of valuable cuttings or seed. Even for larger shipments, the cost for letter rate airmail may be competitive with air express freight. Parcels sent letter-rate airmail should be marked: "This parcel may be open for inspection."

All mail shipments require the use of the yellow and green mailing label received with your permit. One of these labels must appear on each parcel of plant materials sent through the mail. Sufficient numbers of these labels should be supplied by you to your foreign shipper. Instructions for their use are printed on the reverse of each. Upon request, APHIS will send you French, German and Spanish versions of the instructions.

It is imperative that a conspicuous piece of paper with your name, address, telephone number, and permit number printed on it be enclosed in each parcel. **DO NOT** instruct your shipper to put this information on the outside of the package.

Mail shipments of plant materials will be inspected at the first U. S. port of arrival with an inspection station through which they pass, regardless of the address on the green and yellow label. After clearance at the USDA/APHIS inspection station, shipments are returned to the mail (no additional postage is needed). If the value of the shipment is less than \$250, Customs duty (if any) will be collected at the post office near you. If the value of the material is more than \$250, it will be routed to the Customs port nearest you, and formal entry must be made by you or your designated agent (broker). Customs will notify you of the shipment's arrival.

Shipments other than mail (cargo, air express, freight) . Shipments received by any means other than mail **MUST** clear Customs, regardless of the shipments' value. The importer or the importer's agent (broker) is responsible both for arranging delivery to an inspection station and forwarding to the final destination after inspection. Plant inspection agents do not have authority to act as a Customs broker. Each container of plant material must be numbered, labeled as to contents (type and quantity) and country of origin, and addressed as shown in Figure 1 .

Sample label	
United States Customs Service _____	
[Name of port where material is authorized to be inspected]	
For delivery to the Plant Protection and Quarantine Inspection Station.	
For account of _____	Permit No. _____
[Name and address of importer]	
From _____	
[Name and address of foreign exporter]	

Figure 1.

Baggage entries . For small quantities of plant material collected or purchased personally in a foreign country, it may be cost effective for you to bring them into the country as part of your baggage. At present, APHIS does not require that a broker's services be contracted for a single small box of plant material imported as personal baggage. As you move through Customs, inform the agent that you have

living plants and require the services of an agricultural inspection agent. You should have a copy of your import permit with you. Remember that PPQ Inspection Stations are generally open only during normal working hours, and that the box of material will have to be left for inspection if the time of your arrival is during off hours. Be sure that your permit number appears on the box, and your name, address and phone number is enclosed. APHIS will generally handle the transportation to an inspection station of a single box of plant material brought in as baggage. However, two or more containers must be transported to the station by a bonded carrier (broker). Once inspected, any forwarding costs to the final destination are the importer's (or authorized agent's) responsibility. For a single box of material, some PPQ stations will be willing to forward the container by one of several cash-on-delivery (C.O.D.) options.

Meeting Custom Requirements

Arrangements with a Customs broker or similar authorized agent should be prepared well in advance of the shipment's arrival date. Date and time of arrival, flight number or ship name, invoice and permit number, type of Customs entry, and all instructions for forwarding the material should be provided to the broker. Labor is usually necessary for handling cargo or freight shipments. Packing and unpacking, moving containers to and from the inspection station, and other labor ARE NOT the responsibility of either Customs officials or Plant Quarantine and Inspection Agents. Labor and associated material costs must be paid by the importer and are generally handled as part of the broker's contract.

Types of Customs entries . Plant material entering the country by means other than the mails are usually subject to one of three different types of Customs procedures. These are:

Informal entry . If the port of arrival is the same as the authorized port of APHIS/PPQ inspection and the shipment is worth less than \$250, informal entry can be used. The Customs duty is paid by cash or check directly to the Customs inspector.

Duty Paid entry . Duty is paid by cash or check with any additional duties covered by bond. If the

port of arrival is not the same as the port of APHIS/PPQ clearance, the cargo must move under a Customs Special Manifest to the authorized port.

Immediate Transportation (IT) entry . This is the most costly type of entry because the services of a broker are required twice. The broker makes the entry and handles inspection followed by transportation to the port of destination without paying Customs duties. Duties are not paid until the shipment enters the Customs port closest to the cargo's destination (either Duty Paid or Informal type entry), for which a broker must again be contracted. It may sometimes be necessary to use this type of entry if the initial port of arrival is very distant from the authorized port of entry.

Plant Inspection

The purpose of plant inspection is to prevent the introduction of disease and insect pests into the United States. Imported plant material will be checked for evidence of pathogen infection or pest infestation. Treatments that will be used on suspect material will be those considered most effective and least likely to cause injury to the material. The cleaner the material, the greater the odds that it will pass inspection without any treatment. The most common treatment used is methyl bromide fumigation under vacuum. A wide range of plant material has passed through this process with little or no injury, but some losses may occur. The amount of time that the shipment will remain at the inspection station varies with both the quality of the material (poorly cleaned plants will receive greater scrutiny), the size of the shipment, and the amount of parcel traffic moving through the station at that time. Inspection may require as much as 10 days, or as little as one. The best way to facilitate rapid turnover of your shipment is to ensure that the plant material is healthy, clean, and free of pests and diseases. If major problems with your material are discovered, you or your agent will be contacted quickly.

Importation of Endangered Species

In accordance with the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), a treaty signed by the United States and many foreign nations, special

documentation must accompany shipments of certain plants named as "protected" by this convention. Documentation required by CITES is **in addition** to that required under previously discussed USDA plant protection and quarantine regulations. If CITES plant material arrives in the United States without proper documentation, it is promptly confiscated.

Plant species are listed in the convention as either Appendix I, II, or III, and, depending on this designation, different types of regulations apply.

Appendix I. Plants designated as Appendix I and intended for import into the United States must have a special import permit issued by the Wildlife Permit Office (U.S. Fish and Wildlife Service, U. S. Department of the Interior, 1000 N. Glebe Road, Arlington, VA 22203). The importer must also obtain an export permit or export certificate from the country of origin. Both must be presented at the time of entry of the plant material into the United States. Appendix I regulations apply to any plant part of designated species, including cut flowers and seeds. Appendix I plants include species of orchids, cacti and other succulents, cycads, and some palms.

Appendices II and III. No special import permit from the Wildlife Permit Office is needed for plants listed as Appendices II and III. However, an export permit, export or re-export certificate from the country of origin is required. To find out the appropriate foreign agency from which the required documentation can be obtained, write or call the Wildlife Permit Office, U.S. Fish and Wildlife Service, U. S. Department of the Interior, 1000 N. Glebe Road, Arlington, VA 22203, (703) 235-1903. All orchids, with the exception of species classed Appendix I, are designated as Appendix II, as are all non-Appendix I species of cactus. Seeds and spores of Appendix II plants (except cycads), and cut flowers of nursery propagated Appendix II orchids are exempt from CITES regulations. Several other exemptions apply, and are described in the literature on CITES which the USDA mails to holders of plant import permits.

General Permit to Engage in Business. If CITES plant material is being imported for resale or some other type of business use, you must obtain a General Permit to Engage in Business from APHIS

(PPQ-APHIS-USDA, Regulatory Services Staff, Room 638, Federal Building, Hyattsville, MD 20782). This special permit costs \$70 and must be accompanied by a completed PPQ Form 621. If you intend to import CITES material for business purposes, request Form 621 when first writing to APHIS for the import permit application. Hobbyist collectors of Appendix I, II, or III plant material do not require the General Permit to Engage in Business.

Postentry Quarantine

Certain plant material can only be imported if grown under postentry quarantine for a specified period of time and at a specified location. A special postentry quarantine agreement form must first be filed with the PPQ before such material can be imported. This form is available from APHIS in Hyattsville, Maryland and also from local PPQ offices. Items under postentry quarantine are kept at prescribed distances from any other plant material and are regularly inspected by an agent of the PPQ. Many temperate and tropical fruit crops are subjected to postentry quarantine. A full listing and compliance regulations are detailed in the packet which accompanies issue of a plant import permit.

Table 1.

Table 1. Ports of entry with PPQ plant insecton stations.
New York (John F. Kennedy International Airport and Hoboken, New Jersey)
Miami, Florida
Orlando, Florida
New Orleans, Louisiana
Brownsville, Texas
El Paso, Texas
Laredo, Texas
Nogales, Arizona
San Diego (San Ysidro), California
Los Angeles (Inglewood), California
Seattle, Washington
Honolulu, Hawaii
San Juan, Puerto Rico