



# 2018 Regulatory News

## ANBP Regulatory Committee

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## ANBP goes to Washington, D.C.

*Summary by Lynn LeBeck,  
Executive Director, ANBP*

- **ANBP tackles shipping challenges in Washington, D.C.**
- [New CFIA website for biocontrol](#)
- [NAPPO RSPM 12 training module to be online soon](#)

This past year we have been very active in addressing regulatory issues that have been impacting the shipping of our beneficials. We have been working with a lobbying firm in Washington, D.C., who helped arrange meetings with critical offices and agencies with the goal of adding language to the 2018 Farm Bill that will ensure our beneficial insects, mites, and nematodes are only regulated by the USDA-APHIS-PPQ, as they have been for many years. Our biocontrol species are not wildlife and have been reared in insectaries and laboratories for years and have been very thoroughly vetted through permitting protocols. We have experienced difficulties with other US agencies and have tried to clarify this officially with little success until we hired a firm to represent our industry. Our main goal is to get the US Fish and Wildlife Service (USFWS) to recognize our species as “farm-raised” or “domestic”, similar to their view of live fish food.

Twice this spring, ANBP Regulatory Committee members convened in Washington, D.C. to accompany our lobbyists who had secured meetings with various offices. This proved insightful and during the summer, with the help of our lobbying firm, we were able to get language in the Draft House farm bill to correctly identify beneficial insects, mites and nematodes as farm/laboratory-raised. In addition, we were invited by USFWS to submit our proof that some sample species are indeed farm-raised. The next step was to keep the critical language in the final draft of the Farm Bill, **which is currently (early October) still not finalized**. Below you can read both the language that has been in the Farm Bill drafts, as well as some of the material we used for a late summer letter-writing campaign below. ANBP member companies in select states were asked to submit letters to their Congressional Delegations who may have had some influence on the Farm Bill.

## Draft Farm Bill language and text from letters to Senators

Beneficial insects, nematodes and mites are an important and sustainable component of integrated pest management. Biological control is the practice of releasing natural enemies (predators and parasites) that seek out crop-destroying insects and mites. These beneficial organisms are farm or laboratory raised in accordance with strict quality control standards, are safe to humans

and do not harm the environment. They simply re-establish the natural balance of nature and keep pest levels low enough to produce successful marketable crops.

When importing beneficial insects, companies receive permits (PPQ 526) to import these beneficial organisms into the United States from the USDA, Animal and Plant Health Inspection Service, Plant Protect and Quarantine APHIS, PPQ. These beneficial organisms are common, found worldwide and have never been endangered or protected, nor do they damage endangered species or their habitats. All beneficial insects, nematodes and mites are fully tested for safety and their origins are verified by the APHIS, PPQ permit process.

Unfortunately, we are often required to obtain duplicative permits for “Declaration for the Importation or Exportation of Wildlife” from the U.S. Fish and Wildlife Service (USFWS). These permits and inspections are costly, duplicative and do not provide any additional environmental protections. Further, the permits sometimes cause delays that result in the loss of the perishable beneficial organisms.

The importation of the safe and highly beneficial organisms should be exempt from USFWS permits per the Service’s own regulations. Federal Regulation 50 CFR 14 regulates the importation and export of wildlife and, in particular, endangered and protected species. Under 50 CFR 14.4, “Insects: Crickets, mealworms, honeybees (not to include Africanized varieties), and similar insects that are routinely farm-raised,” are considered domesticated animals and therefore exempt from permit requirements. None of the insects, nematode or mites produced and imported our companies should be considered regulated wildlife under 50 CFR 14.

The **House farm bill report language** addresses this issue and would provide needed guidance to USFWS. The report language states:

*Beneficial insects*

Beneficial insects are an important and sustainable component of integrated pest management (IPM). Biological control is the practice of releasing natural enemies (predators and parasites) that seek out crop-destroying insects and mites. These natural predators, which are farm- or laboratory-reared in accordance with strict quality control standards, are safe to humans and do not harm the environment. Biological control is an important component of organic and conventional IPM and resistance management programs.

The Committee believes that the importation of farm-reared beneficial insects, mites and nematodes, which are native or established in the United States, and which have been continuously produced in controlled industrial settings for many generations, are appropriately regulated by the Department of Agriculture’s Animal and Plant Health Inspection Service import permits (PPQ 526). Consistent with Federal Regulation 50 CFR 14.4, which exempts farm-raised insects from the definition of wildlife, these beneficial insects, mites and nematodes shall not require a Declaration for the Importation or

Exportation of Wildlife from the U.S. Fish and Wildlife Service (USFWS). USFWS permits and inspections are costly, duplicative and do not provide any additional environmental protections. Further, the duplicative permits cause clearance delays that result in the loss of a highly perishable product.

**Results?** We will report back when the Farm Bill is finalized and after the Fall Board of Directors meeting near Washington, D.C.

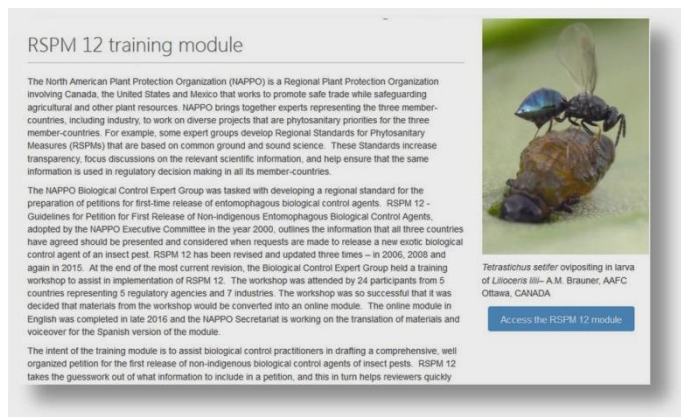
## Canadian Food Inspection Agency (CFIA) creates new biocontrol webpage



Check out the new [webpage](#) by CFIA.

## NAPPO RSPM 12 training module to be online soon

*The intent of the training module is to assist biological control practitioners in drafting a comprehensive, well organized petition for the first release of non-indigenous biological control agents of insect pests. RSPM 12 takes the guesswork out of what information to include in a petition, and this in turn helps reviewers quickly identify where there are gaps in our knowledge of the pest and the proposed biological control agent, as well as the risks, if any, of releasing the new agent.*



Bookmark this [site](#) for future reference.