

Recommended ACP Breach Protocol

The following is a recommended protocol which will be followed in the event of a breach of an APHIS-approved insect-resistant structure in an area quarantined for Asian Citrus Psyllid in California. This recommended protocol was developed collaboratively by the California Citrus Risk Assessment Team, a collaborative group of USDA and CDFA representatives tasked with analyzing regulatory incidents and ensuring consistent enforcement within California.

Unintentional Breach

1. Upon detection of a breach of an APHIS-approved insect-resistant structure, the nursery should immediately notify CDFA and USDA staff, as indicated on the nursery's ACP compliance agreement.
2. Local CDFA and/or USDA inspectors will inspect the structure and affected plants. This is generally completed within 24 hours of notification, depending on the size of the structure breached, timing of notification, and possible safety concerns, including reentry periods for pesticide treatments.
3. Upon completion of inspections, local inspectors will provide a full report to Risk Assessment Team. The report will include: timeline of the incident, initial breach report, inspection reports, descriptions and pictures of the breach and any repairs, and any insect or plant samples submitted for diagnosis.
4. The Risk Assessment Team will perform an analysis of the situation based on the following factors:
 - a. Length of time the structure was breached prior to detection and repair
 - b. Size of breach
 - c. Number and type of past breaches and pest disease finds for the structure and at other structures at the location
 - d. Diagnosis of any samples collected/submitted, and degree of infestation or pathogen detection
 - e. Presence or absence of pathogens, target vectors, and hosts in the geographic area of the nursery site at such distances or levels that spread of these pathogens or vectors into the nursery is either likely or not
 - f. Chemical application records supporting appropriate use of pesticides
 - g. Destruction or treatment of any infested material
 - h. Interviews with employees or others familiar with operational procedures
5. Based on this analysis by the Risk Assessment Team, one or more of the following actions may be taken:
 - a. Suspension of USDA certification for interstate movement
 - b. Suspension of CDFA registration of affected propagative source trees

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- c. Additional inspections, trapping, and/or testing for regulated pests
6. Analysis and summary of actions taken will be submitted by the Risk Assessment Team to USDA and CDFA leadership with a recommendation for final disposition (reinstatement, cancellation, etc.).
7. The nursery will be notified by the Risk Assessment Team of any required actions.

Intentional Breach

1. If a nursery determines that repairs to a structure are necessary that will involve intentionally breaching the structure, the nursery must submit a plan in advance to the Risk Assessment Team for analysis and recommendation. The plan should be submitted at least 2 weeks prior to any construction to allow adequate time for review and approval.
2. During breach of the structure, the nursery must maintain continuous protection of all citrus nursery stock and propagative source trees. This may be accomplished by one or more of the following:
 - a. Covering all trees with approved screening or other approved material
 - b. Creating a barrier between all trees and the breach using approved screening or other approved material
 - c. Moving all trees into a protected compartment of the APHIS-approved structure
 - d. Moving all trees under safeguard into another APHIS-approved structure
3. After repairs, local CDFA and/or USDA inspectors will inspect the structure for compliance with USDA standards, and will inspect any citrus trees present for regulated pests.
4. If the structure and citrus trees pass inspection, then the structure will be recertified and the trees will be released from hold. No additional hold period, disease testing, or treatment will be required.

California Citrus Risk Assessment Team

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