



Overview of Improvements to Supplemental Permit Conditions

Starting January 1, 2019, updates to supplemental permit conditions include the following:

Updates to Recordkeeping Requirements
(All permits): Requires maintenance of records sufficient to demonstrate compliance with the procedures, processes, and safeguards used to prevent escape, dissemination, and persistence of the regulated article, as specified in the current permit and supplemental permit conditions and any associated design protocols/SOPs; records must include who performed an activity and when.
(All permits): Records must be kept of the final disposition of the regulated article.
(Movement permits): Records must be kept of all points of origin and all intermediate and final locations/destinations of viable regulated material. Records must indicate the approximate amount and type of the regulated article, including strain or line identification, for each location.
(Release permits): Records of equipment cleaning must be kept, including who cleaned the equipment, when and where the cleaning was done, the methods of cleaning, and, if applicable, the methods and locations of disposal of viable material recovered from the equipment.
General Updates to Reporting Requirements
Regarding Unauthorized or Accidental Releases, the conditions will be revised as follows: <ul style="list-style-type: none">• Examples of situations that require immediate verbal notification and written notification within 24 hours, will be included. This includes any evidence of incursions of domestic (farm) animals.
To improve transparency, conditions for Planting Reports, Volunteer Monitoring Reports, and Field Test Reports will now include data fields that are already required or auto populated in ePermits but that are not currently specified in the supplemental permit conditions.
Updates to Planting Reports
To facilitate effective compliance oversight and efficient and productive inspections, the supplemental permit conditions will require accurate information about field sites by specifying that: <ul style="list-style-type: none">• If a location identified with a Planting Unique ID is replanted, a different Planting Unique ID must be provided for the new planting(s).• GPS coordinates must be in decimal degree format and must be sufficient to identify the location of the planting.• A planting/release report of “no planting” or “no release” must be submitted no later than 30 calendar days after the expiration date of the permit, when no planting or release occurred for sites listed in the permit.
Updates to Volunteer Monitoring Reports
The requirement for annual monitoring reports prior to termination of a multi-year permit will be applied on a case-by-case basis rather than to all multi-year permits.

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To facilitate effective compliance oversight and efficient and productive inspections, the supplemental permit conditions will require accurate information about volunteers by specifying that:

- The report must indicate the specific volunteer monitoring approach followed if multiple options were authorized, including the monitoring period, interval, and volunteer management requirements for the approach followed.
- All observations of volunteers must be reported.
- For reporting the number of volunteers, a sampling strategy can be used if more than 100 volunteers identified.
- The reports must include the developmental stage of any volunteers observed (e.g. seedling, vegetative, flowering, etc.).
- Annual post-termination volunteer monitoring reports will be required within specified times if volunteer monitoring extends for greater than one year.
- When volunteer monitoring is not necessary (e.g., due to plant-back), a volunteer monitoring report is still required, but the report must specify “no monitoring” and include an explanation as to why monitoring did not occur (e.g., new authorization number for plant-back).

Updates to Field Test Reports – Annual and Final

With regards to field test reports: Under 7 CFR 340.4(f)(9), a field test report is required within 6 months after the termination of the field test

- This requirement is being deferred to no later than six months after the expiration date of the permit.
- When a release occurs, the Field Test report is required, even if the permit is renewed or BRS authorizes all or part of any field test sites to be planted back.

The requirement for annual Field Test reports prior to termination of a multi-year permit will be applied on a case-by-case basis rather than to all multi-year permits.

To facilitate effective compliance oversight and efficient and productive inspections, the supplemental permit conditions will require accurate information about field tests by specifying that the Field Test report must include information about:

- Plant stage at the time of termination (for early termination).
- For disposal, must include location, type, and approximate amount of material disposed of.
- For destruction/devitalization, must include date, location, and method of devitalization used.
- If regulated material still growing in the field, it must be authorized by APHIS and the authorization number must be provided.

For stored material, permittees are allowed to report the *approximate* amount of material stored, including the address and/or GPS coordinates in the description of each location.