

# Petition Process Improvement Project Update

BRS Stakeholder Meeting  
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# Petition Process



- Developers of a GE organism may petition APHIS for a determination of “nonregulated status” (7 CFR 340.6)
- 1992-1999: average 178 days
- Recently: 2-5 years or longer
- 23 pending petitions





# Process Improvement Project

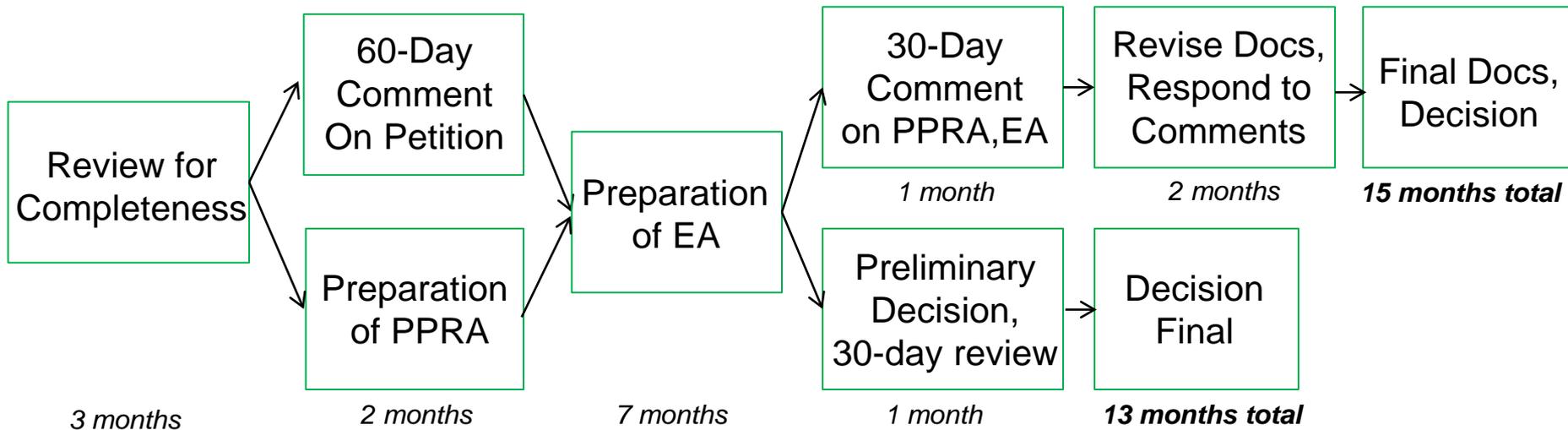
- Used “Lean Six Sigma” process improvement techniques
  - Streamlined, standardized process with defined deadlines
  - Resource management and tracking tools
  - Clearer separation of plant pest risk assessment and NEPA functions
  - Earlier opportunity for public involvement
- Will reduce timeline to 13-16 months
- No compromises to quality of analysis

# Old and New Compared

## Previous Process



## Improved Process





# Implementation and Transition



- All process improvements now implemented
  - Process improvements announced in Nov. 2011
  - Changes to public input and transition plan published in March 2012 *FR* notice
  - First nine petitions published for new comment period in July 2012
- Six older petitions will complete the remainder of the previous process
  - Too far along to “back up”
- All other petitions, including future ones, will follow the new process



# Implementation and Transition



- As part of the new process, BRS has created a new petition table on our website.
- Under the new process, petitions will be added once the petition is deemed complete and announced through a *Federal Register* notice
- The new table also has a section for petitions that are continuing through the old process; they will appear there when documents are available to go with them.

# Results to Date



Process Step	# of Petitions	Actual, Days	Previous, Days <sup>1</sup>	Days Saved
Initial petition review	5	28	205	-177
Petitioner response	5	23	107	-84
Final petition review	7	41	39	2
<i>All review steps</i>	5	64	324	-260
Draft PPRA	6	73	143	-70
Draft NEPA document	--	TBD	213	TBD

<sup>1</sup>Average since 2005



# Questions?