

**PPQ Deputy's Safeguarding Award  
Submission Form**

**1. Name, address, job title and phone number of nominee (if a group is being submitted, provide the contact information for the group leader and the names and affiliation of all members of the group)**

The brainchild of the Florida State Plant Health Director, Mike Shannon, the Miami Pest Risk Management Committee (PRMC) was created in 1998. Representatives from management, officers, identifiers, the union and the Florida Division of Plant Industry (DPI), comprised the initial PRMC membership. Later on, SIT-C and the regional PPQ/VMO were added to the list.

The following is a list of the current permanent PRMC members:

Gerard Russo, Chairperson, Maritime Director and Maritime Office Liaison  
Dr. Charles Brodel, Vice Chairperson, Entomologist, National Coleoptera Specialist and Miami Inspection Station Liaison  
Julie Aliaga, Florida State Operations Support Officer  
Mike Wright, Miami Port Director  
Louis Lodyga, Environmental Supervisor II, DPI  
Camille Morris, SIT-C Supervisor  
Dr. John Parrott, Regional PPQ VMO  
Robert Skafidas, NAAE representative  
Thomas Dobbs, Technical Support, Entomologist, National Heteroptera Specialist  
William Tang, Technical Support, Entomology & Malacology Identifier  
Gordon Muraoka, Miami Inspection Station Director  
Ann Ferguson, Miami International Airport Director  
Robert Stykes, Air Cargo Operations Director  
Steven Bagenski, Miami Operations Director  
George Robinson, AQI-M Specialist, Special Liaison to the PRMC  
Agustine Iole, PPQ Officer, Miami International Airport Liaison  
Francisco Olvera, Air Cargo Compliance Officer, Air Cargo Liaison  
Carol Muraoka, PPQO ACS Supervisor, Operations Liaison

We also have many support members who occasionally are involved in a project pertinent to their unit:

Thomas Skarlinsky, Entomology Identifier  
Frederick Zimmerman, Plant Pathology and Malacology Identifier  
Fernando Lenis, Entomology Identifier  
Sherrie Keblish, K-9 Officer  
And others

The PRMC would like to recognize also the leadership of the previous Miami Port Director, William Manning, who along with SPHD Mike Shannon, gave us a critical and unconditional support from the beginning.

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## **2. Describe the action that enhanced safeguarding.**

The PRMC focuses on identifying new and overlooked pathways. Using statistically valid sampling procedures, the committee gathers information to determine the level of risk associated with selected AQI activities. At the end of these studies, the committee presents recommendations to the local PPQ management in order to abate the introduction and establishment of invasive pests.

Through the years since its creation, the PRMC has reviewed several projects and completed three major ones: The Cargo Aircraft Boarding Project, the Italian Tile Project and the Spanish Tile Project. The committee is currently working on its fourth major project involving Mail Couriers.

### **A. The Cargo Aircraft Project**

This study was conducted over a 12 month period, beginning on September 1, 1998 and ending on August 31, 1999. The PRMC understood that a controlled study involving statistically valid sampling procedures would generate usable data while helping to overcome a lack of information about the pest risk posed by cargo aircraft landing at the Miami International Airport and a lack of published information about the pest risk posed by cargo aircraft in general.

Sampling protocols were designed in consultation with USDA, APHIS, Policy and Program Development (PPD) staff in Headquarters. It was determined that 2 samples per day throughout the study period would satisfy our needs. Sample selection and inspection processes were determined and detailed instructions were provided to each PPQ Officer in Miami.

Exactly 703 aircraft were sampled during the study period. Of these, 74 or 10.5% were found to contain at least one reportable pest. The report addressed more specific approach rates by region and country. The study showed 156 reportable pests that were intercepted from the 74 infested aircraft. Some of these aircraft contained multiple pests.

Considering this study focused on aircraft as a pathway of pest introduction, it is impressive that 27 interceptions represented first finds in aircraft

nationwide. These 27 also represented 17.3% of the overall number of interceptions in the sampled aircraft. In other words, of every 6 or so pests intercepted in the sampled aircraft, one had never before been intercepted by PPQ Officers in aircraft at any US port of entry.

## **B. The Italian Tile Project**

This project surveyed and measured in a scientific manner the pest risk associated with ceramic and marble tiles from Italy. This particular type of cargo is one of the major pathways of pest introduction at the Port of Miami, yielding more than 600 pest finds each year. The project addressed the following concerns: what percentage of the Italian tile containers is infested with quarantine significant pests? What are the approach rates of various actionable pests? What part does seasonality play in the approach rates of each of these categories of pest? Do infested containers tend to originate from particular exporters?

The study was conducted over a 12-month period, beginning June 1, 2000 and ending May 31, 2001. All ceramic, marble or granite tile or bricks from Italy were considered for random selections. Using a hypergeometric sampling table and with a risk level of 3%, the sample was set at minimum 98 containers for the entire year. The shipping lines were selected at random. Officers performed intensive inspections of the interior and exterior of the containers, cargo, pallets, dunnage and crating.

A total of 108 containers were selected randomly for intensive inspection during the year long study. The numbers of infested containers peaked twice – in July and in January. The PRMC study revealed monthly infestation rates of containers between 0 and 60% whereas regular inspections yielded monthly infestation rates of 1.7 to 19.2%. The approach rate for Italian tiles in average is 26.85%.

## **C. The Spanish Tile Project**

The purpose for this study was to measure the pest risk associated with ceramic and stone tiles from Spain. More than 23,000 containers of Mediterranean tiles were imported into the United States through the seaport of Miami in fiscal year 2002; more than 11,000 of these were from Spain. The Spanish tile study addressed the following questions: what percentage of Spanish tile containers is infested with quarantine-significant pests? What are

the approach rates of various actionable pests? What part does seasonality play (if any) in the approach rates of each of these categories of pest? Are pests distributed evenly throughout the containers? What is the interception gap for Spanish tile at the Port of Miami – the difference between actual infestation rates and the level of infestation detected by standard inspection procedures? Do infested containers tend to originate from particular exporters?

The study was conducted over a 12-month period beginning September 1, 2001 and ending on August 31, 2002. The sampling and inspection protocols for this study were similar to that for the Italian tile study. All ceramic, marble or granite tiles or bricks from Spain were considered for random selections. A total of 130 containers were selected for intensive inspection during this yearlong study. The Spanish tiles project report showed an overall infestation rate of 6.2%. Like the Italian tiles, there is a peak in the interceptions in the winter period. In additions, the study showed another seasonal peak in the summer period.

### **3. How did the action enhance safeguarding?**

#### **A. The Cargo Aircraft Boarding Project**

When this study was completed, the committee made 8 recommendations in an effort to mitigate the risk associated with foreign-arriving cargo aircraft. Some of these recommendations have been implemented in the port; some others are still a work in progress.

One of the recommendations called for a change in coverage at the FIS General Aviation Center (GAC) where cargo aircraft and passengers are cleared by the three agencies, Customs, Immigration and Agriculture. We went from a regular, 8 hours a day to a 24 hour, 7days a week service. The GAC staff increased from 1-2 to 20 officers around the clock. In addition, there is a supervisor in place for every shift. This change has provided for a tremendous improvement in controlling cargo shipments and entry documents clearance.

Another recommendation called for the continuation of the intensive boarding of aircraft arriving from countries that have been found heavily infested with pests. Through this activity, officers inspect 100% of these flights and find numerous actionable pests, as their reports show.

The study also recommended moving towards a monitoring-based system for clearing cargo aircraft arriving from areas that were heavily sampled, yet produced lower approach rates. To be able to accomplish this, we needed to staff the General Aviation Center (GAC) around-the-clock and we needed to develop a Compliance Agreement for garbage disposal with airlines under this monitoring system. In addition, we needed a better cargo accountability system in place. The first two steps discussed above have been implemented and we are close to finishing the final step using a combination of the U.S. Customs' ACS system and an electronic 212 Hold Sheet database. When we complete this operation, the Port of Miami will have an electronically based air cargo accountability system for the first time in its history.

### **B. The Italian Tiles Project**

The overall infestation rate for containers in this study was 26.85. In contrast, the rate for regular inspections was only 5.8%. This large “interception gap” indicates that regular inspection procedures, while detecting 569 infested containers of Italian tile during the study period, still failed to detect approximately 78% of the infested containers coming through the Port. Approximately half of the quarantine pests were found in the front half of the container – an area not typically inspected during tailgate inspections.

The study report recommended a series of tile inspection protocol improvements in order to close the interception gap found between this project and regular inspections. Due to the impressive approach rate for Italian tiles, the PRMC recommended the presence of supervisors for large tile inspections. Officers were encouraged to climb all the way to the front of the containers and to use flashlights and other inspection tools to be able to find more pests.

### **C. The Spanish Tiles Project**

Previous to this study, it was assumed that there were very few pests with Spanish tiles during the summer months. Our protocols called for only a 50% inspection of Spanish tiles from June through September. This period is in fact, the highest pest risk for this commodity due to the presence of snails.

This pest risk analysis for the whole year allowed us a much more judicious use of PPQ resources on a month-by-month basis. In comparison, a yearly

lump sum of pest risk would have caused us to miss this shifting seasonal pattern of risk.

One of the major reasons for doing intensive inspections is to project the difference between actual infestation rates and the level of infestations uncovered during our standard container inspections. These standard inspections primarily involve tailgate inspections. The difference found was an interception gap of 89%, meaning current inspection procedures miss nearly nine out of ten infestations. This translates into approximately 639 infested container escaping detection per year.

After this study, the PRMC recommended management to rescind the current Miami policy of holding only 50% of Spanish tiles for inspection from June through September. During the summer months, Spanish tiles should have equal or higher priority with Italian tiles. Because a large interception gap was found for Spanish tiles, the PRMC also recommended improved inspection protocols identical to those proposed for Italian tiles. Many of these improved inspection protocols have already been officially implemented at the Port of Miami.

#### **4. How does it demonstrate innovation or initiative?**

The creation and operation of this committee is a novel and unusual activity. The Miami PRMC is the only functional Pest Risk Committee in the nation. During the 5 years since its creation, the PRMC has undertaken the following major pest risk pathway studies: the Cargo Aircraft Boarding, the Italian tiles, the Spanish tiles and the Mail Courier projects. Both the Cargo Aircraft Boarding and the new Mail Courier projects direct our attention to pest pathways that have never been considered seriously or studied by the Agency before.

In addition to these major studies, the committee created an Interception Reward System as a tool for the managers in the port of Miami to recognize and reward those officers with the highest interception numbers as well as promoting quality and diversity of interceptions. This Interception Reward System has been used successfully for 2 years.

The Miami PRMC, in its commitment to be a step ahead of invasive species, invites specialists to give us presentations on a diversity of pests that are perceived to be a threat for Florida's agriculture, such as: the Giant African

Snail, Citrus Leprosis, and Citrus Canker. We sponsor the same presentations as training to the officers in the ports of Miami and Fort Lauderdale.

In turn, the committee follows up by identifying possible pathways for each of the pest subjects in the presentations and works towards minimizing the introduction risk and preventing the establishment of these pests. Currently, we are engaged to start a new PR awareness campaign for the Giant African Snail in Florida. We are working on this project with the support of Dr. James Smith from CPHST-PERAL and with the assistance of the Legislative and Public Affairs Office.

In addition, members of the Miami PRMC have been actively involved in the creation of a PRMC in the Fort Lauderdale, Florida work unit.

**5. Which of the four areas of the Safeguarding Review does the activity support?**

Pest Exclusion, reviewing the current port activities designed to exclude invasive plant pests or their lack of such activities, conducting risk assessments to detect uncommon or overlooked pest pathways and making recommendations for improving risk management.

**6. What recommendation or safeguarding principle does the action support?**

E-107 Require port staff to collect and use agricultural quarantine inspection monitoring data as it was intended.

E-109 Initiate and implement work shifts to coincide with workload and where workload criteria justify a second shift and hold management accountable for implementations.

E-110 Assign staff at ports of entry where evidence shows the need for permanent staff.

In addition, “Revise port of entry staffing regulations, policies and guidelines to assign staff based on risk and workload.” The PRMC helps management to identify holes in our exclusion programs and after careful studies, places recommendations for changing staffing, protocols, policy and guidelines.

**7. Provide any information that demonstrates the outcome/success of the activity.**

The PRMC was able to achieve its accomplishments by bringing together and integrating functions of the PPQ Eastern Regional office, the Florida State Plant Health Director's office, PPQ Port of Miami, the State Department of Agriculture, CPHST and others. It was the critical mass of these separate levels of government working together in one committee that made its' activity possible. This committee has broken ground on its' projects and led the country and agency in many issues.

As a direct result of the Cargo Aircraft Boarding Project, the Port of Miami has implemented several changes aimed at a better control of cargo shipments through the use of an electronic database, better staffing and longer hours of service. The electronic database system will benefit the process of releasing cargo as well as providing information on the commodity status and movement. All these improvements have benefited our customers who deal with the clearance of entry documents at GAC.

Based on the project results and the continuous intensive inspections of cargo aircraft from certain countries of origin, IS/APHIS personnel in Costa Rica is interested in following a project recommendation of mitigating the pest risk at origin. IS/APHIS has contacted the Costa Rican Ministry of Agriculture on this issue and are meeting with airline carriers to implement mitigating measures.

Dr. Barney Caton from the Center of Plant Health and Technology (CPHST) is currently reviewing this project. We hope after their careful study, CPHST will put a recommendation for a change in cargo aircraft inspection protocol nationwide.

Based on the Italian Tiles Project recommendations, the Maritime Port of Miami has placed new container inspection procedures in the hope of improving the rate of interceptions and closing the gap between actual infestations and regular inspection interceptions. Officers are better equipped to do the job and supervision has improved for large tile inspections.

After reviewing this report and alarmed at the interception rate demonstrated in this study, a group of International Service and Port Operations personnel

traveled from Headquarters to Italy about six months ago to talk to the Italian Quarantine Service and to the Ceramic Tile Manufacturers Association in order to develop measures that will reduce the pest risk associated with tile shipments. Some tile manufacturers have changed their procedures for storage and packing to reduce the number of pests on their shipments.

An agreement was reached with the Italian Quarantine Service and the Tile Manufacturer Association for specific storage and packing procedures for tile manufacturers shipping into the United States. Port Operations will follow-up with manufacturers to ensure they are in line with the new packing and storage protocol. The interception rates will be evaluated to determine if the number of interceptions has decreased based on the same time period last year. Manufacturers with a history of quarantine pest interceptions will be considered high risk and 100% inspections will be enforced on their shipments.

Our latest completed study, the Spanish Tiles Project has already caught the attention to the DHS Interim Director for the Maritime Port of Miami. The Director has been working with the CBP/AQI Maritime Director and the authors of this and the Italian tiles project to draw a plan that will streamline the container inspections and make a better use of our staffing resources.

This study demonstrated that during the summer months it is essential to inspect a higher rate of containers rather than the current 50% rate. This recommendation is also taken in consideration for staffing this unit throughout the year as well as for rewriting container inspection procedures.