# Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala to the United States

Effective Date: [06/09/2025]

### **Table of Contents**

Certification of Operational Workplan Review and Revision Tracking	3
Program Overview and Signature Page	4
Definitions and Acronyms	
1. Program Overview	
2. Roles and Responsibilities of Participants	
3. Requirements for Entry into the United States	
4. Noncompliance, Suspension, and Termination	20
5. Program Audit and Oversight	21
Appendix A Requirements for Avocado Moth and Weevil Pest Free Plac	es of Production for
Hass Avocado Intended for Export to the United States	23

#### Purpose:

The purpose of this worksheet is to accurately document periodic review of the operational workplan (OWP) and document the approval of changes to the OWP.

Date Certified	Certified by Offshore Program Manager	Description of Any Modifications (include reference to modified OWP section number)	New Signature of OWP Required?

Effective Date of this document	06/09/2025
Countries involved	1) United States of America
	2) Republic of Guatemala
Commodity	Fresh avocado fruit (Persea americana var. Hass)
Type of Program	Audit-based Offshore Program; APHIS-NPPO co-
	audits at least once every 5 years or upon request
Pests of concern	Arthropod
	Coleoptera: Curculionidae
	1) Conotrachelus aguacatae Barber
	2) Conotrachelus perseae Barber
	3) Heilipus lauri Boheman
	4) Copturus aguacatae Kissinger; syn.
	Macrocopturus aguacatae (Kissinger)
	Lepidoptera: Coleophoridae
	5) Holcocera plagatola Adamski
	Lepidoptera: Elachistidae
	6) Stenoma catenifer Walsingham
	Lepidoptera: Noctuidae
	7) Euxoa sorella Schaus
	Lepidoptera: Tortricidae
	8) Amorbia santamaria Phillips and Powell
	9) Cryptaspasma perseana Gilligan & Brown
	10) Histura perseavora Brown
	11) Netechma pyrrhodelta (Meyrick)
	Fungus
	Dothideomycetes: Myriangiales
	12) Elsinoë perseae (Jenkins) Rossman & W.C.
	Allen
Mitigation Measures	Systems approach
	Pest Free Places of Production
Date of next OWP review	On or before 5 years from signature date
Date of last signed version (if applicable)	Not applicable

The United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), and the Ministerio de Agricultura, Ganadería, y Alimentación (MAGA), Agricultural and Environmental Integral Protection Program (PIPAA) of Guatemala jointly developed this Operational Workplan (OWP).

This OWP details the phytosanitary measures required for the production, packing, safeguarding, export certification, and shipping to comply with regulations governing the importation of fresh Hass avocado fruit into the United States from Guatemala. It includes the roles and responsibilities of each participant; the regulated pests of concern and associated pest mitigation measures necessary to ensure the phytosanitary integrity of commodities exported to the United States; programmatic review and auditing requirements; actions to be taken in the event of noncompliance or nonconformance to the OWP; and is intended to protect against the introduction of quarantine significant pests via this pathway.

APHIS policies for Preclearance and Offshore Programs apply to this program. Deviations must be requested in writing and approved by APHIS Preclearance and Offshore Programs prior to implementation. This OWP shall be in force when signed and until a new workplan is approved and signed by all parties, or either party withdraws from the agreement. Program participants must meet all requirements of this OWP as verified by PIPAA of Guatemala and APHIS before exporting fresh Hass avocado fruit per this agreement.

On behalf of the United States:

On behalf of Guatemala:

## Acting Director for Emily Pullins

Emily Pullins, Ph.D.

Date

Director, Preclearance and Offshore Programs
USDA – APHIS – Plant Protection and
Quarantine

Ing. Jurge Gomez Wate June 10, 2025

Plant Health Director Ministerio de Agricultura, Ganadería, y Alimentación (MAGA) Definitions based on ISPM 5, 19 CFR 101.1 and 7 CFR 319.56 Subpart L- Fruits and Vegetables

**ACIR:** Agricultural Commodity Import Requirements. ACIR provides a single source to search for and retrieve entry requirements for imported commodities. ACIR information includes lists of APHIS-approved facilities and entities, treatment schedules, inspection procedures, and other necessary information to determine admissibility, without the need to access multiple manuals.

**Additional Declaration (AD):** A statement required by an importing country to be entered on a phytosanitary certificate and which provides specific additional information on a shipment in relation to regulated pests or regulated articles. <sup>1</sup>

**ANAGUACATE:** Avocado Producers Association

APHIS: United States Department of Agriculture, Animal and Plant Health Inspection Service.

**Audit**: A documented verification process. In the phytosanitary context, an audit is a documented, systematic review of a phytosanitary system or procedure to evaluate the level of control, ensure that it conforms with the requirements set by the auditing NPPO (the NPPO responsible for the audit), and evaluate whether the system or procedure is achieving the expected phytosanitary objectives. <sup>2</sup>

**Authorized Service Provider:** The authorized service provider is an external organization authorized by the NPPO to conduct limited services associated with the operational workplan.

**Bilateral operational workplan (OWP):** A plan that details the activities that the national plant protection organization (NPPO) will carry out to meet the requirements of a program, subject to APHIS approval, and signed by both parties (NPPO and APHIS). <sup>4</sup>

**Commercial Consignment:** Fruits or vegetables imported for sale and distribution and not for personal use. Such identification will be based on a variety of indicators, including, but not limited to: Quantity of plant material, type of packaging, identification of grower or packinghouse on the packaging, and documents consigning the plants for planting to a wholesaler or retailer.<sup>3</sup>

**Commodity**: A type of plant, plant product, or other article moved for trade or other purpose. <sup>1</sup>

Consignment: A quantity of plants, plant products, or other articles, including fruits or vegetables, being moved from one country to another and covered, when required, by a single phytosanitary certificate (a consignment may be composed of one or more commodities or lots). The merchandise described on the bill of lading or other document used to file or support entry, or in the oral declaration when applicable.<sup>13</sup>

Cooperative Service Agreement (CSA): an agreement with non-federal entities for APHIS to provide technical assistance, goods, or services on a full cost-recovery basis.

Corrective Action Request (CAR): A change request form that documents a nonconformance with a product or process in the operational workplan and requests the recipient to identify and remove the root cause. A corrective action is meant to address the cause of a nonconformity and prevent its recurrence.

Country of origin: The country where the plants from which the plant products are derived or grown. 1

**Inspection:** Official visual examination of plants, plant products or other regulated articles to determine if pests are present or to determine compliance with phytosanitary regulations.<sup>1</sup>

Lot: The shipment of a single commodity sent from a single production site to a packinghouse in one day. A number of units of a single commodity, identifiable by its homogeneity of composition and origin, forming all or part of a consignment.

MAGA: Ministry of Agriculture, Livestock and Food

National Plant Protection Organization (NPPO): The official service established by a government to discharge the functions specified by the International Plant Protection Convention.

**Noncompliance**: Activities or products found to be contrary to, or in violation of, APHIS's import regulatory requirements.

**Nonconformance**: Activities or products found to be contrary to, or in violation of, the program requirements as described in this document.

**Permit:** A written, oral, or electronically transmitted authorization to import fruits or vegetables in accordance with 7 CFR 319.56 Subpart L.<sup>3</sup>

[06/2025]

Phytosanitary Certificate (PC): A document, including electronic versions, that is related to a consignment that: (1) Is patterned after the model certificate of the International Plant Protection Convention, a multilateral convention on plant protection under the authority of the Food and Agriculture Organization of the United Nations (FAO); (2) Is issued by an official of a foreign national plant protection organization in one of the five official languages of the FAO; (3) Is addressed to the national plant protection organization of the United States (Animal and Plant Health Inspection Service); (4) Describes the consignment; (5) Certifies the place of origin for all contents of the consignment; (6) Certifies that the consignment has been inspected or tested according to appropriate official procedures and is considered free from quarantine pests of the United States; (7) Contains any additional declarations required in the Agricultural Commodity Import Requirements (ACIR); and (8) Certifies that the consignment conforms with the phytosanitary requirements of the United States and is considered eligible for importation pursuant to the laws and regulations of the United States.<sup>3</sup>

PIPAA: Agricultural and Environmental Integral Protection Program

**Place of Production**: Any premises or collection of fields operated as a single production or farming unit. This may include production sites that are separately managed for phytosanitary purposes. <sup>1</sup>

**Plant pest**: Any living stage of any of the following that can directly or indirectly injure, cause damage to, or cause disease in any plant or plant product: A protozoan, a nonhuman animal, a parasitic plant, a bacterium, a fungus, a virus or viroid, an infectious agent or other pathogen, or any article similar to or allied with any of these articles.

**Production site**: A defined portion of a place of production utilized to produce a commodity that is managed separately for phytosanitary purposes. This may include the entire place of production or portions of it. Examples of portions of places of production are a defined orchard, grove, field, greenhouse, screenhouse, or premises. <sup>1</sup>

**Quarantine pest:** A pest of potential economic importance to the area endangered by it and not yet present there, or present but not widely distributed there and being officially controlled. <sup>1</sup>

**Regulated pest:** A quarantine pest or a regulated nonquarantine pest. The list of U.S. Regulated plant pest can be found at: <a href="https://www.aphis.usda.gov/aphis/ourfocus/planthealth/import-information/rppl/rppl-table">https://www.aphis.usda.gov/aphis/ourfocus/planthealth/import-information/rppl/rppl-table</a>

**Suspension:** A suspended place of production is not allowed to ship material under this OWP until approved by APHIS.

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala
[06/2025] Page 9 of 24

**Systems Approach:** A pest risk management option that integrates different measures, at least two of which act independently, with cumulative effect.<sup>1</sup>

#### **Citations:**

- 1. International Standards for Phytosanitary Measures (ISPM) 5: Glossary of phytosanitary terms. https://www.ippc.int/en/publications/622/
- 2. International Standards for Phytosanitary Measures (ISPM) 47: Audit in the phytosanitary context. <a href="https://www.ippc.int/en/publications/91185/">https://www.ippc.int/en/publications/91185/</a>
- 3. 7 CFR Part 319 Subpart L Fruits and Vegetables (or modified from). https://www.ecfr.gov/current/title-7/subtitle-B/chapter-III/part-319/subpart-L
- 4. ACIR Glossary. <a href="https://acir.aphis.usda.gov/s/acir-glossary">https://acir.aphis.usda.gov/s/acir-glossary</a>

#### 1.1. Commodities included in this program

1.1.1. Commercial consignments of fresh avocado fruit (Persea americana var. Hass)

#### 1.2. Regulated Pests

- 1.2.1. *Conotrachelus aguacatae* Barber (Coleoptera: Curculionidae)
- 1.2.2. Conotrachelus perseae Barber (Coleoptera: Curculionidae)
- 1.2.3. Heilipus lauri Boheman (Coleoptera: Curculionidae)
- 1.2.4. *Copturus aguacatae* Kissinger; syn. *Macrocopturus aguacatae* (Kissinger) (Coleoptera: Curculionidae)
- 1.2.5. Holcocera plagatola Adamski (Lepidoptera: Coleophoridae)
- 1.2.6. Stenoma catenifer Walsingham (Lepidoptera: Elachistidae)
- 1.2.7. Euxoa sorella Schaus (Lepidoptera: Noctuidae)
- 1.2.8. Amorbia santamaria Phillips and Powell (Lepidoptera: Tortricidae)
- 1.2.9. Cryptaspasma perseana Gilligan & Brown (Lepidoptera: Tortricidae)
- 1.2.10. Histura perseavora Brown (Lepidoptera: Tortricidae)
- 1.2.11. Netechma pyrrhodelta (Meyrick) (Lepidoptera: Tortricidae)
- 1.2.12. *Elsinoë perseae* (Jenkins) Rossman & W.C. Allen (Dothideomycetes: Myriangiales)

#### 1.3. Participating Organizations

- 1.3.1. United States Department of Agriculture, Animal and Plant Health Inspection Service (APHIS)
- 1.3.2. Ministry of Agriculture, Livestock and Food (MAGA) delegates the execution of inspection and certification activities in the field and packing facilities to the Agricultural and Environmental Integral Protection Program (PIPAA)
- 1.3.3. Registered Packinghouses, Places of Production, Production Sites, and Exporters
- 1.3.3.1. Commercial entities participating in the production, preparation, packaging, transportation, marketing, and export of regulated fresh Hass avocado fruit. These can include, but are not limited to producers, packaging operators, warehouse or storage facility operators, and transit dispatchers. These entities may be collectively referred to as Exporters.

#### 1.4. Relevant Authority & Agreements

1.4.1. Fresh Hass avocado fruit from Guatemala is subject to inspection at the port of entry and all general requirements set forth in the United States Code of Federal Regulations (CFR), Title 7: Agriculture, Part 319 - Foreign Quarantine Notices, Subpart 56 - Fruits and Vegetables.

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala
[06/2025]

Page 11 of 24

- 1.4.2. Phytosanitary conditions for the import of fresh Hass avocado fruit from Guatemala are set forth in the United States Code of Federal Regulations (CFR), Title 7: Agriculture, Part 319 Foreign Quarantine Notices, Subpart L Fruits and Vegetables and in the Agricultural Commodity Import Requirements (ACIR) Online Database. ACIR located at: <a href="https://acir.aphis.usda.gov/">https://acir.aphis.usda.gov/</a>.
- 1.4.3. Articles accompanied by unmanufactured wood articles, or packaging materials, including wood packaging material, are subject to the International Plant Protection Convention's International Standards for Phytosanitary Measures 15: Regulation of wood packaging material in international trade (ISPM 15) and APHIS's regulations under 7 CFR, Part 319, Subpart I Logs, Lumber, and other Unmanufactured Wood Products, and Subpart N Packaging Materials. These articles may be subject to port of entry compliance verification.
- 1.4.4. Articles and conveyances are subject to inspection requirements as described in 7 CFR Part 330 Federal Plant Pest Regulations; General; Plant Pests; Soil, Stone, And Quarry Products; Garbage and Part 352 Plant Quarantine Safeguard Regulations. These and other applicable U.S. Regulations may be accessed at <a href="http://www.ecfr.gov">http://www.ecfr.gov</a>.
- 1.4.5. Articles are subject to port of entry document verification, and may be subject to other monitoring, physical inspection, or other actions at U.S ports of entry as deemed necessary by the Department of Homeland Security, U.S. Customs and Border Protection (CBP), U.S. Food and Drug Administration, and other pertinent Federal regulatory agencies.

#### 2. Roles and Responsibilities of Participants

#### 2.1. The Animal and Plant Health Inspection Service (APHIS) will:

- 2.1.1. Support program operations by providing technical guidance to PIPAA as needed or upon request.
- 2.1.2. In collaboration with PIPAA, maintain, review, and revise workplan as necessary. This includes evaluating the OWP for revision at least once every 5 years.
- 2.1.3. Work cooperatively with PIPAA and program participants to review and evaluate program operations, quarantine pest management practices, and other safeguarding measures in response to noncompliance events or program audit corrective actions. Site visits, including audits, may also be conducted as part of regular program oversight, at least once every 5 years. APHIS will provide information on the outcome site visits to PIPAA within 15 business days.
- 2.1.4. Provide guidance and instructions to CBP for port of entry clearance of consignments.

#### 2.2. Agricultural and Environmental Integral Protection Program (PIPAA) will:

- 2.2.1. Monitor program operations and perform monthly site visits to ensure that program participants conform to the OWP, and other phytosanitary standards established by APHIS and PIPAA.
- 2.2.2. Provide sufficient qualified PIPAA personnel to implement program requirements.
- 2.2.3. Ensure compliance with import requirements for fresh Hass avocado fruit from Guatemala by regularly consulting the ACIR online database. ACIR is found at: <a href="https://acir.aphis.usda.gov/">https://acir.aphis.usda.gov/</a>
- 2.2.4. Maintain documentation related to PIPAA's program oversight, to include participant nonconformance with the requirements of this OWP and corrective actions taken to resolve the nonconformance with this OWP. Maintain records for at least three years and provide to APHIS upon request.
- 2.2.5. In collaboration with APHIS, maintain, review, and revise workplan as necessary. APHIS and PIPAA will evaluate the OWP for revision at least once every 5 years.
- 2.2.6. Select a cooperator who will sign a Cooperative Service Agreement to reimburse APHIS's cost of conducting program audits or site visits. The cooperator will then establish a trust fund account to send and receive funds.
- 2.2.7. Inspect, approve, and register the places of production, production sites, and packing facilities that meet conditions as indicated in this OWP.
- 2.2.8. Establish and maintain a monitoring program for the pests listed in Section 1.2 to delineate pest free places of production and production sites as described in the Appendix A: Requirements for Avocado Moth and Weevil Pest Free Places of Production for Hass Avocado Intended for Export to the United States.
- 2.2.9. Maintain an APHIS-approved quality control program, including record keeping, to monitor and audit the survey programs; and provide records to APHIS upon request.
- 2.2.10. Maintain an up-to-date list of registered and active program participants, including name, physical address, and the NPPO-approved facility identification code for places of production, production sites, and packinghouses, and provide the list to APHIS annually by October 1 and upon request.
- 2.2.11. Inspect each lot presented for export certification and sample avocado fruit following any post-harvest processing. The sample will be visually inspected for all quarantine pests, and a portion of the fruit will be cut open to detect internal pests based on a sampling rate determined by APHIS (see section 3.1.4)
- 2.2.12. Ensure phytosanitary certificates are only issued for inspected consignments that contain solely fresh Hass avocado fruit originating from registered places of production or production sites, and that were packed in registered and APHIS-approved packing houses operating in conformance with the parameters established in this OWP.
- 2.2.13. Take immediate action to correct and document any nonconformance to the OWP. If necessary, PIPAA will suspend or revoke participant registration until the

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala
[06/2025]

Page 13 of 24

nonconformance has been resolved and immediately report any participant suspension to APHIS.

## 2.3. Registered Packinghouses, Places of Production, Production Sites, and Exporters will:

- 2.3.1. Maintain up-to-date knowledge of the phytosanitary requirements established by APHIS in ACIR and by PIPAA, conform to the conditions of this OWP, and comply with APHIS and PIPAA's regulations and policies for the export of fresh Hass avocado fruit to the United States.
- 2.3.2. Register places of production, production sites (if applicable), and packinghouses with PIPAA at least 30 days prior to the start of the export season.
- 2.3.3. Cooperate with APHIS and PIPAA to maintain the phytosanitary integrity of the program.
- 2.3.4. Notify PIPAA weekly of their fruit packing schedules so that PIPAA inspectors may arrange for inspections.
- 2.3.5. Allow APHIS and PIPAA access to the production, packing, warehouse, and facilities used for the production, processing, and export of fresh Hass avocado fruit to the United States and allow access to all records and documents relating to the operations of the program.
- 2.3.6. Comply with PIPAA's monitoring program as described in *Appendix A:*Requirements for Avocado Moth and Weevil Pest Free Places of Production for Hass Avocado Intended for Export to the United States.
- 2.3.7. Conduct phytosanitary control measures on all fresh Hass avocado fruit arriving at the packing plant, which includes culling of damaged fruit prior to packing.
- 2.3.8. Ensure that all boxes or packaging for export meet the traceability requirements described in Section 3.1.3
- 2.3.9. Bear the costs of APHIS personnel providing support or oversight to the fresh Hass avocado fruit export program.

#### 3. Requirements for Entry into the United States

#### 3.1. Phytosanitary Measures and Actions Applied in the Exporting Country

# 3.1.1. Registered Places of Production and Production Sites and Avocado Production Practices

- 3.1.1.1. A registered place of production consists of a grove or collection of groves operated as a single production or farming unit. A place of production may have multiple production sites, each separately managed for phytosanitary purposes.
- 3.1.1.2. A registered production site consists of a single orchard and is associated with or equivalent to a place of production.

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala
[06/2025] Page 14 of 24

- 3.1.1.3. All places of production, existing production sites, and packing houses that participate in the fresh Hass avocado fruit export program must be registered and approved by PIPAA or APHIS prior to the beginning of each export season, or at least annually.
- 3.1.1.4. Producers must comply with PIPAA's monitoring program as described in Appendix A: Requirements for Avocado Moth and Weevil Pest Free Places of Production for Hass Avocado Intended for Export to the United States.
- 3.1.1.5. All participants must maintain records of their procedures for at least 3 years and make them available to PIPAA and APHIS upon request.

#### 3.1.1.6. <u>Avocado Production Requirements</u>

#### 3.1.1.6.1. Pre-harvest

3.1.1.6.1.1. Growers must maintain orchard sanitation so that all plant litter and fallen fruits are discarded from the places of production and production sites routinely (at least once every seven days).

#### 3.1.1.6.2. Harvest

- 3.1.1.6.2.1. PIPAA will visit and inspect the places of production or production sites (if applicable) monthly, starting 30 days before harvest, and continue until the end of the harvest at each place of production or production site, to ensure growers are following the measures in the OWP.
- 3.1.1.6.2.2. Growers must properly identify all field bins by lot and place of production and production site (if applicable) to enable traceability and maintain the fruit's identity by lot or grower from harvest through packing.
- 3.1.1.6.2.3. Growers must ensure that fallen fruit are not included in field containers of avocado fruit brought to the packinghouse for export.
- 3.1.1.6.2.4. Growers must cull all damaged fruit.
- 3.1.1.6.2.5. Growers must ensure harvested fruit are free of leaves, twigs, and other plant parts.
- 3.1.1.6.2.6. Producers must safeguard and protect the fruit from pest infestation by pest exclusionary material with holes no larger than 1.6 mm or plastic tarpaulin while in transit from the registered place of production or production site (if applicable) to the registered packinghouse and while awaiting packing. PIPAA must document the safeguarding process and provide records to APHIS upon request.

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala
[06/2025]

Page 15 of 24

#### 3.1.2. Registered Packinghouse Safeguarding Measures and Requirements

- 3.1.2.1. <u>Facility Registration and Safeguarding Measures</u>
  - 3.1.2.1.1. All packinghouses that participate in the avocado export program must be registered and approved by PIPAA at least 30 days in advance of packing fruit for export.
  - 3.1.2.1.2. During the time the packinghouse is in use for exporting Hass avocado fruit to the United States, packinghouses may only accept fresh Hass avocado fruit from registered and approved places of production or production sites (if applicable).
  - 3.1.2.1.3. All packinghouse activities (including program material loading and unloading, cleaning, sorting, packing, and post-processing storage) must be in a pest exclusionary processing area with safeguarding measures that prevent the entry of quarantine pests.
  - 3.1.2.1.4. Entry and exit points for staff and packing material into pest exclusionary processing areas must include a vestibule. The vestibule doors must function so that only one door can be opened at a time. This includes entrances into the facility and between pest exclusionary areas within the facility.
  - 3.1.2.1.5. All loading and unloading points for program material into pest exclusionary processing areas must include either:
    - 3.1.2.1.5.1. Loading bay doors with boots and rollup/rolldown doors.

      Gaps between conveyance enclosure and loading bay doors cannot exceed 6 inches (includes height differential between conveyance floor and bottom of loading bay doors) OR
    - 3.1.2.1.5.2. The loading area between any conveyance and the pest exclusionary processing areas must be safeguarded with a temporary or permanent pest exclusionary structure. The pest exclusionary structure must have material covering all openings with holes no larger than 1.6 mm (i.e., a frame with pest exclusionary screen or netting).
  - 3.1.2.1.6. All other openings to the exterior must be covered by pest exclusionary material as described in Section 3.1.2.3.1
  - 3.1.2.1.7. Packinghouses must keep packing and storage areas clean and free of plant debris, soil, and regulated pests and inspect pest-proof material of pest-exclusionary areas for holes or breaks each day prior to processing and packing operations. If any holes or breaks are present, packers must repair before packing plant operations can begin.
  - 3.1.2.1.8. If packers detect any pests listed in Section 1.2 inside the pest-exclusionary areas during the packing operation, all the Hass avocado

- fruit being processed at the time of the detection will be ineligible for export to the United States.
- 3.1.2.1.9. Packers must pack all harvested fruit approved for export under this program within a 24-hours of harvest or safeguard the fruit in a pest-exclusionary chamber until packing.

#### 3.1.2.2. Fruit Selection and Processing

- 3.1.2.2.1. Packers must cull damaged fruit from lots before they enter safeguarded areas of the packing plant.
- 3.1.2.2.2. Packers must ensure culled fruit does not enter safeguarded areas of the packing plant.
- 3.1.2.2.3. Packers must remove all culled fruit daily from the packing plant.
- 3.1.2.2.4. Packers must clean fruit by dry brushing or washing.

#### 3.1.2.3. Packing and Safeguarding

- 3.1.2.3.1. The packinghouse must pack Hass avocado fruits in pest exclusionary material with holes no larger than 1.6 mm (e.g., pest-proof bags, cartons, or pallet covers) or pack in refrigerated container for transport to the United States. Safeguarding must remain in place until CBP clears the consignment for release into U.S. commerce. Otherwise, the consignment may be refused entry.
- 3.1.2.3.2. The packages containing the fresh Hass avocado fruit must not contain any other fruit, including Hass avocado fruit not qualified for export to the United States under this program.
- 3.1.2.3.3. Packinghouse must label boxes of fresh Hass avocado fruit with traceability information as described in Section 3.1.3.
- 3.1.2.3.4. Packinghouse will present lots to PIPAA for export inspection and certification following the procedures in Section 3.1.4.
- 3.1.2.3.5. Packinghouse must store packed Hass avocado fruit destined for the United States physically separate from commodities destined for other markets by a minimum distance of one meter.

#### 3.1.2.4. <u>Loading</u>

- 3.1.2.4.1. PIPAA must inspect all conveyances and containers prior to loading to ensure freedom from hitchhiking pests, debris, and other contaminants.
- 3.1.2.4.2. Once loaded, exporters must close and immediately seal container doors under the phytosanitary supervision of PIPAA.

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala
[06/2025]

Page 17 of 24

3.1.2.4.3. Exporters should take care during loading to minimize the possibility of container infestation by hitchhiking pests and contaminants. Any gaps between the container and the safeguarded area must be enclosed (see 3.1.2.1.4). Also loading should only take place during daylight hours and the loading area must be kept free of weeds.

#### 3.1.3. Traceability

- 3.1.3.1. Fruit from registered places of production and production sites must be packed in boxes traceable to where the fruit was grown. This information must remain with the fruit throughout the export process. Labeling must include:
  - 3.1.3.1.1. The PIPAA assigned registration identification and name of the originating place of production, production site (if applicable), and packinghouse (see 2.2.10);
  - 3.1.3.1.2. The name of the municipality and Department in which it was produced;
  - 3.1.3.1.3. The type and amount of fruit it contains;
  - 3.1.3.1.4. Lot number;
  - 3.1.3.1.5. Date packed;
  - 3.1.3.1.6. The name and registration identification of the exporter if different from 3.1.3.1.1; and
  - 3.1.3.1.7. Labeling large enough for inspectors to easily read and understand.

#### 3.1.4. Export Inspection and Phytosanitary Certification by PIPAA

- 3.1.4.1. To be eligible for export and phytosanitary certification (PC), lots must pass PIPAA inspection. The PC must include the name and registration identification of both the place of production or production site (if applicable) and the packinghouse. Refer to ACIR (https://acir.aphis.usda.gov/) for any additional declarations required on the PC.
- 3.1.4.2. *If export inspection and Phytosanitary Certification takes place at the packinghouse:* Registered packinghouses are required to notify PIPAA of their fruit packing schedules to plan for necessary phytosanitary export certification activities.
- 3.1.4.3. For each lot presented for export, the PIPAA inspector:
  - 3.1.4.3.1. Must sample fruit for inspection and verify that they originate from, and were processed at, registered and approved places of production, production sites (if applicable), and packinghouses.
  - 3.1.4.3.2. Will randomly select 149 fresh Hass avocado fruits and visually inspect for the presence of pests or indications of pest damage, using a

- magnifying glass or other inspection tools if necessary. This sampling rate represents a 95 percent confidence level of detecting a 2% pest population (ISPM 31).
- 3.1.4.3.3. Will cut all suspect or damaged fruit (including seeds), or a minimum of 29 fruit per lot (whichever is more) to detect the presence of internal pests (ISPM 31).
- 3.1.4.4. PIPAA shall identify any pests found to species level. Any organism unidentifiable to species or whose quarantine significance is unknown is considered quarantine significant by APHIS for regulatory purposes and associated fruit should not be certified for export under this OWP.
- 3.1.4.5. PIPAA must retain inspection results, including traceability information for the sample, sample size, number of fruit cut (if applicable), and any pest and disease findings in accordance with record requirements described in Section 2.2.4 of this OWP.
- 3.1.4.6. If PIPAA detects a live quarantine pest during the fruit inspection process, they will reject the entire lot belonging to or associated with the inspected sample. Reconditioning and resampling are not permitted.
- 3.1.4.7. Exporters may recondition, resample, and submit for re-inspection, consignments with detections of leaves, branches, or other nonquarantine contaminants if no quarantine pests are found during export inspection.
- 3.1.4.8. Additional actions following quarantine pest detections in Guatemala are detailed in Section 4.2 of this OWP.
- 3.1.4.9. PIPAA must ensure lots rejected for export to the United States are removed from the packing house. If they cannot be removed immediately, PIPAA must ensure the lot is covered with pest-proof material as described in Section 3.1.2.3.1 or be stored in a dedicated cold chamber until disposal or removal arrangements are made.

#### 3.1.5. Post-certification Activities

- 3.1.5.1. Exporters may combine any lots that have passed inspection into one consignment.
- 3.1.5.2. Exporters are responsible for safeguarding fruit after certification through the phytosanitary measures outlined in Sections 3.1.2.3 and 3.1.2.4.
- 3.1.5.3. Exporters must package noncontainerized consignments in a manner that prevents infestation during transit by regulated pests. Boxes must be pest-proof or pallets must be covered with pest-proof material or mesh as described in Section 3.1.2.3.1 during transportation.
- 3.1.5.4. Exporters must seal enclosed cargo containers under the phytosanitary supervision of PIPAA with a numbered strip or button seal. PIPAA will record the seal number on the PC.

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala
[06/2025]

Page 19 of 24

3.1.5.5. Exporters must maintain phytosanitary safeguards including pest-proof packaging or seals applied to cargo containers and kept intact until cleared by Customs and Border Protection upon arrival in the United States.

#### 3.2. Measures and Actions Applied in the United States

- 3.2.1. All consignments are subject to port of entry clearance upon arrival in the United States. Clearance may include physical inspection and fruit cutting to verify freedom from quarantine pests.
- 3.2.2. Failure to meet all entry requirements, including required documentation, may cause clearance delays and, if not resolved, could result in rejection of the consignment for entry.

#### 3.2.3. Imports will only be allowed when:

- 3.2.3.1. The fruit are imported in commercial shipments.
- 3.2.3.2. The fruit is accompanied by an import permit issued in accordance with 7 CFR § 319.56-3(b).
- 3.2.3.3. Each commercial shipment of fruit is accompanied by a phytosanitary certificate issued by PIPAA.
- 3.2.3.4. The commercial shipment was produced in accordance with the requirements of this systems approach agreement authorized under 7 CFR 319.56-4.
- 3.2.4. Refer to Section 4.3 of this OWP for actions following quarantine pest interceptions at the port of entry.

#### 4. Noncompliance, Suspension, and Termination

- 4.1. If PIPAA or APHIS determine that any place of production, production site, packinghouse, or exporter is not in conformance with the conditions of this workplan, the participant may be denied registration, approval, export certification services, or continued participation in this program.
- 4.2. Detection of any regulated pest (listed in Section 1.2) during export inspection or phytosanitary certification activities in Guatemala will result in the following:
  - 4.2.1. PIPAA will reject the entire lot.
  - 4.2.2. PIPAA will immediately suspend fresh Hass avocado fruit exports from the associated place of production or production site to the United States and notify APHIS.
  - 4.2.3. PIPPA must investigate the source of the regulated pest.

- 4.2.4. APHIS may elect to participate in the investigation.
- 4.2.5. The place of production or production site must implement any remedial actions recommended by PIPAA or APHIS.
- 4.2.6. PIPAA will provide a report of findings, their corrective action requests (CARs), evidence of CAR resolution, and participant status to APHIS.
- 4.2.7. The suspension remains in effect until the pest risk is determined resolved by both PIPAA and APHIS.

#### 4.3. Actions following noncompliance during U.S. port of entry clearance:

4.3.1. Interception of any regulated pest may result in rejection of the consignment upon entry if no mitigation measure is available.

#### 4.3.2. Upon of any detection of any regulated pest (see 1.2):

- 4.3.2.1. APHIS will immediately suspend the place of production from participation in the program and will notify PIPAA of the suspension.
- 4.3.2.2. Imports of fresh Hass avocado fruit from the place of production will be refused entry to the United States.
- 4.3.2.3. Actions described in 4.2.2 to 4.2.6 will apply.
- 4.3.2.4. The suspension remains in effect until the pest risk is determined resolved by both PIPAA and APHIS.
- 4.3.3. APHIS may require a joint program audit with PIPAA if there are repeated incidents of noncompliance from program participants. APHIS may suspend the program pending the outcome of the program audit. The audit may require site visits.
- 4.3.4. Non-pest related noncompliance issues (e.g., paperwork or packaging discrepancies, contamination, prohibited material) may also be cause for program audit, temporary suspension of the registered place of production, or other adverse actions if they are recurring or pose a potential risk to the program.
- 4.3.5. Either signatory party reserves the right to voluntarily withdraw from this workplan. Withdrawal will result in suspension of all exports of fresh Hass avocado fruit from Guatemala to the United States and territories until such time that all parties agree to, document, and sign a new or revised workplan.

#### 5. Program Audit and Oversight

- 5.1. PIPAA must periodically audit program operations (at least once annually) to ensure that participants are conducting activities in accordance with this workplan and applicable APHIS and PIPAA policies and regulations.
- 5.2. Participants must maintain all records identified in this OWP for at least three years and make them available to APHIS upon request.

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala
[06/2025]

Page 21 of 24

- 5.3. PIPAA must request modifications or deviations to this OWP in writing for approval by APHIS prior to implementation.
- 5.4. APHIS reserves the right to request a program audit, which may include a site visit, as part of regular monitoring of the program. APHIS also reserves the right to perform a site visit prior to commencement of exports under this OWP. The site visit will consist of a joint APHIS and PIPAA audit team that will evaluate program operations in the country of origin, verify conformance to the conditions of this OWP and compliance with the applicable regulations and policies.
- 5.5. The PIPAA-selected cooperator will reimburse APHIS for the cost of conducting program audits or site visits by depositing money in a trust fund (see Section 2.2.6).
- 5.6. PIPAA will schedule and coordinate audits and site visits. Cooperator representatives may participate in the audit.
- 5.7. Program participants may provide onsite logistical support and assistance for APHIS staff during a site visit.

[06/2025] Page 22 of 24

#### **Appendix A** Requirements for Avocado Moth and Weevil Pest Free Places of Production for Hass Avocado Intended for Export to the United States

For fresh Hass avocado fruit from Guatemala to qualify for export to the United States, PIPAA must ensure that the fruit is grown in pest free places of production with a pest survey and control program for the avocado moth (Stenoma catenifer, Cryptaspasma persiana, Holcocera plagatola, Euxoa sorella, Amorbia santamaria, Histura perseavora, Netechma pyrrhodelta) and avocado weevil (Conotrachelus aguacatae, C. Perseae, Heilipus lauri and Copturus aguacatae) pests listed in Section 1.2 of the operational work plan (OWP). The pest survey and control program will establish and maintain pest free places of production for avocado moths and avocado weevils as part of a systems approach and prevent their accidental introduction into the United States.

At a minimum, the program must include the following key components:

- A-1. General Program Requirements
- Participant Registration Prerequisites A-2
- A-3. Pest Survey and Control Program Requirements
- Pest Detection Response Protocol Requirements A-4.
- A-5. Record Keeping

#### A-1. **General Program Requirements**

PIPAA must implement an APHIS-approved pest survey and control program to monitor and maintain pest free places of production.

- A-1.1. PIPAA must maintain a quality control program to monitor audit the pest survey and control program in accordance with the OWP.
- A-1.2. The program must include a pest detection response protocol and orchard sanitation measures described in section 3.1.1 of the OWP.
- A-1.3. Surveillance activities must be carried out by PIPAA, or an Authorized Service Provider trained by and under supervision of PIPAA. Personnel conducting trapping and pest surveys must be hired, trained, and supervised by the NPPO of Guatemala.

#### A-2. **Participant Registration Prerequisites**

For places of production and production sites to qualify for registration and approval by PIPAA for participation in this program, they must:

- A-2.1. Complete registration at least 30 days before harvest.
- A-2.2. Have an approved implementation of PIPAA's pest survey and control program.

[06/2025]

A-2.3. Have a site map with the location of the places of production, production sites (if applicable), and buffer zones, including latitude / longitude coordinates. The map must also identify the survey location.

#### A-3. Pest Survey and Control Program Requirements

The pest survey and control program must meet the following APHIS requirements:

- A-3.1. Trapping surveys for pest free places of production and production sites (if applicable) must include representative areas from the entire place of production and a 1 km buffer zone extending from the exterior edges of places of production (or exterior edges of clustered places of production.)
- A-3.2. For the first 5 years, PIPAA must conduct semiannually surveys of each participating place of production, productions site (if applicable), and buffer zone. After 5 consecutive years without pest detections of the moth and weevil pests listed in Section 1.2 of the OWP, PIPAA can transition to an annual survey as long as the participating place of production remains pest free.
- A-3.3. PIPAA must visit and inspect places of production, production sites (if applicable), and buffer zones monthly, starting 30 days before harvest, until harvest is complete to verify that growers are complying with all requirements.

#### A-4. Pest Detection Response Protocol Requirements

The pest detection and response protocol must meet the following APHIS requirements:

- A-4.1. Detection of one or more avocado moth or avocado weevil listed in Section 1.2 of the OWP during a survey or during any other monitoring or inspection activity in the place of production or production site (if applicable) will result in immediate suspension of the pest free place of production or production site from the export program until appropriate measures to reestablish pest freedom, agreed upon by PIPAA and APHIS, have been taken.
- A-4.2. Detection of one or more avocado moth or avocado weevil listed in Section 1.2 of the operational workplan in a place of production, production site (if applicable), or buffer zone will immediately activate pest control measures from the PIPAA's pest management plan and the actions in Section 4.2 of the OWP will apply.

#### A-5. Record Keeping

- A-5.1. PIPAA must maintain a database of all survey and monitoring records, including service data and findings, as well as records of any associated control actions if necessary.
- A-5.2. These records must be updated at least monthly and at each survey interval.
- A-5.3. Records must be maintained for at least three years after harvest and made available to APHIS upon request.

USDA APHIS Systems Approach Operational Workplan for the Export of Fresh Hass Avocado Fruit from Guatemala

[06/2025] Page 24 of 24