

## Regulatory Challenges to the growth of the North American Commercial Beneficials Industry

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The movement of Beneficial Insects and Mites between political jurisdictions has always been a challenge. In the later part of the Twentieth Century, once large scale commercial air transport became normalized, Governments quickly reacted to the relatively easy accessibility of exotic or foreign produced Beneficials by requiring inspection and/or certification of some type.

In an effort to be expedient, many Countries grabbed a Certification system “off the shelf”, that, although it was never written with Insects or Mites in mind, was the closest thing they could quickly develop and implement. The infamous “Veterinary Certificate” is an example. This Certificate was adopted by many European and Asian Countries, and, is still being used today. This is despite the fact that there isn’t a Veterinarian on the planet who is capable of making the required statement.

An alternative to the “Veterinary Certificate” was to do what the United States did, and that was to require all Insects and Mites to enter a Quarantine/Inspection facility. This worked on the principle that everything coming into the US was “guilty” until proven innocent.

For North American producers of Beneficials, both of these systems have caused considerable, if not insurmountable difficulties. American producers have a very difficult time obtaining a “Veterinary Certificate”. The USDA does not do them. Some States have done them, and, some Counties have also done them, but many American producers have just found the process too difficult, and, as a result, have not exported their product to jurisdictions that require the certificate. Canadian producers, exporting to the US have had to add a complete day to their shipments, in order to comply with the “Quarantine/Inspection” process.

Some jurisdictions, like the US, also require “Transit Permits”. These are required if your product simply flies over the US. The logic is, that if the plane crashes in the US, the “Transit Permitted” Beneficials could be unintentionally released.

Since 9/11, additional inspection processes have further jeopardized our industry. General screening at airports using large x-ray machines, which is still in the rumor/experimental stage, threatens to stop all International shipments of Beneficials. These large x-rays, capable of examining large packages could be powerful enough to sterilize the Beneficial Insects and Mites. Avoidance of security devices is not a viable strategy. Stickers saying “Do not X-ray” would probably have very little effect on people who are charged with the Security of their Homeland.

Add to these constraints the fact that most Air Couriers, as a policy, will not carry live Insects, although most do anyway, for now, at least.

Applying for the first time release of an Exotic Beneficial is, and should be, a slow, deliberate process. The Regulators are attempting to make decisions with very little scientific knowledge, however. And recent decisions by Governments, all over the world, to reduce funding for basic research, will only make the process that more difficult. As a

result, the industry can expect very little in the way getting new Beneficials into their Countries. Existing Beneficials, produced externally will also be more carefully scrutinized. The new definition; “Country of Production” at NAPPO (North American Plant Protection Organization) is intended to help Regulators asses the risk, based on where the Beneficial is produced.

The development and use of a non-exotic Beneficial can also be restricted, based on Regional ecologies. The descriptive term; “Generalist” should never be used when describing a predator for release. Even if the new predator eats everything you give it, don’t call it a “generalist”. Take the time to list everything that it eats. Regulators have to make serious decisions about allowing something new to be released, and the term “generalist” just makes their decision much easier.

One of the hardest issues for the North American industry relates to “jurisdictional overlap”. Many government agencies have a vested interest in the production, sale, shipment and release of Beneficials. At the national level of the US, the most obvious overlap is with Fish and Wildlife. The exclusion phrase is “farm raised”. All Beneficials being moved either internally, or externally, should be described as “farm raised”. Fish and Wildlife are not interested in “farm raised”, and their mandate excludes “farm raised” animals (and insects). This does not prevent Fish and Wildlife exercising their right to hold and inspect anything, at any time, however.

The sphere of Beneficials has included pollinating insects, for many years. This has caused many problems for the industry, as, in many Countries, including Mexico, pollinators are considered “livestock” and fall out of “plant protection”, where the US and Canada deal with them. Developing cohesive and relevant policy has been, and continues to be, a significant challenge.

Staying with pollinators, the US has had a very restrictive policy and enforcement of all aspects of Honey Bees, in an attempt to prevent numerous pests and diseases from entering North America. Despite these very strict steps taken, North America has been overwhelmed by most of these same serious diseases and pests over the past 10 years. The most obvious reason is that Bee related products, documented for Human consumption, are frequently finding their way into domestic Bee production.

Despite all of the above constraints, the North American Commercial Beneficials Industry is surviving and thriving in some markets. Most of the credit goes to the individual people and companies that have found ways to work within the Regulatory frameworks that currently exist. The rest of the credit goes to the Regulatory Agencies. Our Industry was invited to attend and contribute to the NAPPO Biological Control Panel. This panel has produced a number of recommendations (RSPMs) that either help the Industry with the import or export of Beneficials, or help the industry build Containment Facilities, or submit Petitions for release. NAPPO, later this year, will send a letter to the Airline Freight Companies, explaining to them how important their continued acceptance of our products is, and how vital a role they play in Plant Protection.