

DRAFT 24 February 2006

**UNITED STATES DEPARTMENT OF AGRICULTURE
ANIMAL AND PLANT HEALTH INSPECTION SERVICE
PLANT PROTECTION AND QUARANTINE
PERMITS, REGISTRATIONS, IMPORTS, AND MANUALS
PEST PERMIT EVALUATIONS**

**INSTRUCTIONS FOR PACKAGING AND LABELING
LEPIDOPTERA PUPAE SHIPMENTS TO THE UNITED STATES**

Prepared by Wayne Wehling, Ph.D. Pest Permit Evaluations
Phone 301-734-8757, Fax 301-734-5392
Wayne.f.Wehling@aphis.usda.gov

The following is a detailed description for packaging, labeling, and shipping live Lepidoptera pupae to the United States under a U. S. Department of Agriculture, Plant Pest Permit (PPQ form 526). These requirements apply only to live Lepidoptera pupae imported into the U.S.A. It does not cover domestic shipment or transiting the United States with pupae, although the packaging portion of these requirements would be more than adequate. The basic tenants expressed here also apply to imported live insect shipments destined for exhibit. These requirements are subject to change. Every attempt will be made to inform the industry and Plant Inspection Stations when changes occur. The routine shipping methods currently in use will be honored for a month or more.

The packaging requirements described below start from the inside of the package at the pupae and work out to the final surface/wrap and labeling.

DEFINITIONS

Courier	Any of the express air shippers including but not limited to: DHL, Emory, FedEx, Skynet, TACA, UPS
Foreign shipper	Butterfly farm shipping pupae to the importer in the U.S.

Hand Carry	Importation of restricted articles in personal baggage by a permanent U.S. resident under a valid plant pest permit..
Importer	U.S. Butterfly Exhibitor with a valid plant pest permit
Pupae	The exposed chrysalis of butterflies or silk covered (cocoon) and pupae of moths

DRAFT

I. PACKAGING THE PUPAE

1a. The pupae must be packaged in a container that will prevent the escape or leakage of any biological material. This includes butterflies, moths, pupae, parasites, pathogens, and fluids from any of the above.

1b. The container can be plastic, Styrofoam, cardboard, etc. as long as it seals against the leakage of any of the items listed above in 1a. If something like a plastic container with matching snap tight lid is used, the lid must be taped to prevent release from changing air pressure during transit. If cardboard is used, the pupae must have absorbent packaging materials capable of holding any fluids that leak from the pupae. Insulation is not a regulatory issue for the USDA and is left to your discretion. Obviously, pupae should be well insulated.

1c. The package must be easy to open for USDA APHIS PPQ inspection. The individual wrapping on the pupae must allow for easy inspection for identification and the packaging must allow for easy sorting and repackaging. My favorite pupae wrap is the plastic vacuum pack sheets for pills or gelatin capsules that have been used for small pupae. If something like this were available for large pupae that would be ideal. A bad packing technique would be a pile of more than 200 pupae individually wrapped in cotton or paper towel where the pile is more than about 5 centimeters deep. Paper towel and cotton work well as long as the pupae are sorted into smaller quantities (say <200) and presented in identified units that are easy to examine. Use small containers or dividers to create a volume of pupae that can be looked through. The inspector must be able to get to every pupae in the package and put the package back together all in 2 minutes.

1d. Units of pupae should be labeled with a scientific name (genus and species).

II. BOXING THE PACKAGED PUPAE.

2a. The secure escape proof pupae package must be placed in a sturdy box. Cardboard is the most common but other containers excepted by the courier are acceptable to APHIS as long as they are sturdy and can be opened to examine the regulated content. A flimsy Styrofoam ice chest without a cardboard exterior would not be suitable. The container should be durable enough to withstand reasonable dropping, stacking, or being kicked without rupturing or breaking any seals. The closed box must have all seams taped. At this point you have achieved double packaging.

III. PACKAGE LABELING, AIRWAY BILLS AND DOCUMENTS

3a. The basic shipping requirement that has been increasingly emphasized over the past year is the practice of using two airway bills to get the package from the foreign shipper to the importer. For most foreign shippers their current packaging methods are fine it's only the labeling that is an issue.

3b. The first airway bill is used from the foreign shipper to the Plant Inspection Station and a second airway bill is used from the Plant Inspection Station to the importer.

3c. Packaging practices do not necessarily need to change to accommodate the airway bill requirements. The second airway bill can be placed inside the sealed box arrived at in 2a. above or the package achieved in 2a. can be wrapped in brown wrapping paper and the foreign supplier can attach the second airway to the box under the wrapping paper and the first airway bill and the red and white label to the outside of the package on the wrapping paper. My recommendation is to use the wrapping paper method. **YOU ARE NOT REQUIRED TO PLACE THE PACKAGE FROM 2a. INTO ANOTHER BOX PRIOR TO SHIPPING** as has been suggest in some emails on this topic. Do not place any airway bills or their plastic sleeves over seams in the box.

3d. The final package, ready to ship to the U.S., must have only the red and white (form 599) label and the first airway bill on the outside

DRAFT

(and any required labels/stickers required by the government of the foreign supplier). The importers address must not appear on the outside of the package entering the U.S. The importers address that appears on the airway bill must match the Plant Inspection Station address on the red and white label. Some older labels for entry through Miami have a post office box address on the label. If you have these labels use the street address for the Miami Plant Inspection Station on the airway bill. The older labels with the post office box are still usable. Do not alter the address on any red and white label.

TRANSITING THE U.S. IN ROUTE TO ANOTHER COUNTRY

Packages of pupae can transit the U.S. in route to another country when accompanied by a "Transit Authorization Letter" prepared by the Pest Permit Evaluation unit. Many packages transit Miami en route from Central or South America to Europe. Of course, other routes are also used. Packages transiting the U.S. must all have Transit Authorization Letters.

RED AND WHITE LABEL (FORM 599)

redandwhitelabelrequest@aphis.usda.gov.

Be sure to keep a 6 month supply of labels on hand. Labels can be requested by email by the permit holder at the above address. All requests must include the permit number. The permit number will be on the label. The foreign supplier must be careful to match the label with the permit for a specified importer. A label is not needed for the airway bill from the Plant Inspection Station to the importer (domestic).

OTHER DOCUMENTS

Follow the recommendations of the U. S. Fish and Wildlife Service for their document requirements and submission of the 3-177

APHIS PPQ Plant Inspection Station requires only a manifest/invoice for the contents of the shipment. A copy of the permit can be included in the box with the pupae. The manifest must match the permit. Never include any pupae that are not on the manifest and the permit.

DRAFT

The issue of the biological/natural history materials export certificate from Malaysia, Philippines, Costa Rica, etc. is a new challenge. These documents are not required under international trade agreements. They are the requirements of the exporting country. Because they are not international and directly tied to CITES I would say they fall outside our purview.

APPROVED PLANT INSPECTION STATIONS FOR CLEARANCE OF LEPIDOPTERAN PUPAE (note the new addition of Seattle)

LOS ANGELES

USDA APHIS PPQ
11840 So. La Cienega Blvd.
Hawthorne, CA 90250
Phone: 310-725-1918
Cargo desk: 310-725-1927
Fax: 310-725-1922



MIAMI

USDA APHIS PPQ
3500 NW 62nd Avenue
Miami, FL 33159
Phone: 305-526-2825, or 526-2933, 526-2944
PPQ-Miami port: 305-526-7221

NEW YORK

USDA APHIS PPQ
JFK International Airport
Building 77, Room 1-27
Jamaica, NY 11430
Phone: 718-553-1733

SAN FRANCISCO

USDA APHIS PPQ
Plant Inspection Station
389 Oyster Pointer Blvd, Suite 2
South San Francisco, CA 94080
650-876-9093

SEATTLE

USDA APHIS PPQ
16215 Air Cargo Road, Suite 112
SEATAC International Airport
Seattle, WA 98158
206-764-6547