
Systems Approach Operational Work Plan for the Export of
Fresh Pomegranate Fruit from **Republic of Turkey** to the
United States

Effective Date: *[date (mm yyyy) of this document]*

TEMPLATE



Summary

This Operational Work Plan (OWP) was developed jointly by the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), and Republic of Turkey (TR), Ministry of Food, Agriculture and Livestock (MFAL), General Directorate of Food and Control (GDFC)

The OWP details the phytosanitary measures required for the production, packing, safeguarding, treatment (if applicable), export certification, and shipping in order to comply with regulations governing the importation of fresh pomegranate fruit into the United States. It includes the duties and responsibilities of each participant; the pest mitigation measures necessary to ensure the phytosanitary integrity of commodities exported to the United States from Turkey; and is intended to protect against the accidental introduction of quarantine significant pests via this pathway. Technical explanations will be provided, as appropriate, to ensure all partners understand the biological basis of the actions required.

APHIS policies for Offshore Programs apply to this program. As signatories to this agreement, deviation from these guidelines is not authorized unless previous approval is given by APHIS Offshore Programs. All deviations will be documented in writing. This OWP shall be in force when signed and until a new work plan is approved and signed by all parties. Exports may only occur after all requirements of this OWP have been met and after verification by the GDFC and/or APHIS.

On behalf of the United States:

[PPQ Name and Title]
Phytosanitary Issues Management
USDA – APHIS – Plant Protection and Quarantine

Date

On behalf of Republic of Turkey:

General Directorate of Food and Control
Dr. Yunus BAYRAM
Acting Deputy Director General

Date

1. Program Overview

1.1. Commodities included in this program:

1.1.1. *Punica granatum* L. (Pomegranate)

Variety names: Hicaz, Caner, Wonderful

Growing seasons: May-October

Harvest seasons: Begins in August and lasts until the midst of November

1.2. Regulated Pests:

1.2.1. - Pomegranate insects present in Turkey

Aphis punicae Passerini,

Aonidiella aurantii (Maskell),

Bostrychus spp.,

Carpophilus spp.,

Ceratitis capitata Wied., (listed Annex 1- Part B of the Regulation on Plant Quarantine)

Ceroplastes floridensis Comstock,

Cryptoblabes gnidiella Mill,

Ectomyelois ceratoniae Zell.,

Lepidosaphes ulmi (L.),

Nilotaspis halli (Green),

Planococcus citri Rossi,

Planococcus ficus (Signoret),

Siphoninus phillyreae (Haliday),

Zeuzera pyrina (Linnaeus, 1761)

- Pomegranate diseases present in Turkey

Alternaria alternata (Black spot)

Alternaria sp. (Alternaria fruit rot)

Aspergillus niger (Aspergillus fruit rot)

Botrytis sp. (Botrytis fruit rot)

Coniella granati (Coniella Rot)

Eutypa lata (Eutypa Dieback)

Fusarium spp. (Fusarium dry rot)

Hop stunt hostuviroid

Penicillium spp. (Penicillium fruit rot)

Phytophthora sp. (Phytophthora gummosis)

Pseudomonas savastanoi pv. *savastanoi*

Xanthomonas axonopodis pv. *punicae*

1.3. Participating Organizations

1.3.1. United States Department of Agriculture, Animal and Plant Health Inspection Service (APHIS)

1.3.2. Republic of Turkey, Ministry of Food, Agriculture and Livestock, General Directorate of Food and Control (Agricultural Quarantine Directorates, Provincial and District Directorates of Food, Agriculture and Livestock)



1.4. Relevant Authority & Agreements

- 1.4.1. Phytosanitary conditions for the import of fresh pomegranate fruit from Turkey are set forth in the United States Code of Federal Regulations (CFR), Title 7: Agriculture, Part 319 - Foreign Quarantine Notices, Subpart 56 - Fruits and Vegetables, Section XX- fresh pomegranate fruit from Turkey (7 CFR 319.56-XX).

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 (ISPM 15) and APHIS' regulations under 7 CFR, Part 319, Subpart 40 - Logs, Lumber, and other Unmanufactured Wood Products, and Subpart 69 - Packaging Materials. These articles may be subject to port of entry compliance verification.

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 <http://ecfr.gpoaccess.gov>

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.

- 1.4.2. Procedures and principles regarding the fact that plants, herbal products and other products shall be subject to plant health in entry to and exit from Turkey have been determined in the "Regulation on Plant Quarantine", published in the Official Journal of 28131 on 03.12.2011.

The principles necessary to prevent harmful organisms to pervade and contaminate by means of wooden packaging materials used in exportation have been determined in the "Regulation on Marking and Processing Heat Treatment of Wooden Packaging Materials", published in the Official Journal of 29368 on 27.05.2015.

These Regulations may be accessed at <http://www.tarim.gov.tr/Sayfalar/EN/Mevzuat.aspx?OgeId=15>

2. Roles and Responsibilities of Participants

2.1. The United States Department of Agriculture, Animal and Plant Health Inspection Service (APHIS) will:

2.1.1. Support program operations by providing technical guidance to **General Directorate of Food and Control** as needed or upon request.

2.1.2. In collaboration with **General Directorate of Food and Control**, maintain, review, and revise work plan as necessary to accurately reflect program operations.

2.1.3. Verify that the responsibilities of all participants with regard to technical requirements have been properly executed and communicate any deficiencies to **General Directorate of Food and Control** to investigate and take corrective action if warranted.

2.1.4. If necessary, based on noncompliance events or program audits conducted in accordance with APHIS' policy, provide qualified personnel to work cooperatively with **General Directorate of Food and Control** and all other program participants to review and evaluate operations in the field and packinghouses, quarantine pest management and control activities, and other safeguarding measures. APHIS will provide audit reports to **General Directorate of Food and Control** in a timely manner.

2.1.5. Provide guidance and/or instructions to CBP for port of entry clearance of consignments.

2.2. The **General Directorate of Food and Control** will:

2.2.1. **Provincial and District Directorates of Ministry of Food, Agriculture and Livestock shall control orchards within production area at least once a year at most four times a year within the production season** program operations to ensure that program participants comply with the OWP and other phytosanitary standards established by APHIS and the **General Directorate of Food and Control**.

2.2.2. Maintain documentation related to **General Directorate of Food and Control**'s program oversight for at least three years and provide to APHIS upon request.

2.2.3. In collaboration with APHIS, maintain, review, and revise work plan as necessary to accurately reflect program operations.

2.2.4. Register and individually approve for export only those **registered production sites** that meet conditions as indicated in this OWP.

2.2.5. **If the pomegranate is a fruit fly host:** Establish and maintain a fruit fly trapping, management, and control program to keep fruit fly population levels within thresholds of APHIS import requirements as described in the **Fruit Fly Trapping Program Appendix** to this OWP.



- 2.2.6. ***If the pomegranate is a fruit fly host:*** Maintain an APHIS-approved quality control program, including record keeping, to monitor or audit the fruit fly trapping program and provide records to APHIS upon request.
- 2.2.7. ***If the pomegranate is a fruit fly host:*** Ensure that only fresh pomegranate fruit originating from registered production sites that have met minimum trapping parameters established in the regulation and this OWP are presented for export inspection and phytosanitary certification.
- 2.2.8. Register and approve all packinghouses participating in this program.
- 2.2.9. Carry out inspection and approval of packinghouses, as well as their storage chambers and transport means, to verify they are clean, free of pests, and can maintain safeguarding requirements.
- 2.2.10. Maintain an up-to-date list of registered program participants, including production sites and packinghouses, and provide the list to APHIS upon request.
- 2.2.11. Conduct export inspection and issue Phytosanitary Certificates (with appropriate Additional Declarations if applicable) only for consignments that pass export inspection and meet all other requirements of this OWP.
- 2.2.12. Before the beginning of each season, check the APHIS online database ‘Fruits and Vegetables Import Requirements (FAVIR)’ entry for fresh pomegranate fruit from Turkey to determine the specific language required for Additional Declaration(s). FAVIR may be found at: <https://epermits.aphis.usda.gov/manual>.
- 2.2.13. Take immediate action to correct any noncompliance issue detected, and if necessary, suspend or revoke participant registration until noncompliance has been corrected, and immediately report any participant suspension to APHIS.
- 2.2.14. **General Directorate of Food and Control** maintain for at least three years all documentation related to noncompliance and corrective actions taken and provide to APHIS upon request.

3. Requirements for Entry into the United States

3.1. Measures and Actions Applied in the Exporting Country

No plant will be grown in pomegranate orchards other than Pomegranates which will be exported to USA.

According to ISPM 26, official or authorized officer of the Directorate of Food and Control shall follow Mediterranean Fruit Fly. The measures and procedures taken in production unit are:

Not to plant fruits such as peach, fig, Trabzon date palm and pomegranate which are intermediary hosting to the orchards to be built newly.

Collecting and burying into deep holes the contaminant fruits which have had fallen off.

Not leaving any fruit in tree after harvesting.

Following pesticide by means of two traps.

3.1.1. Registered Production Unit/ Registered Greenhouse Crop Production Measures and Actions

At least 1 (one) trap shall be hung within 1 (one) kilometer in the orchards where the Pomegranates to be exported to USA are grown. The traps shall be hung in such a way to be approximately 1,5-2 m higher from ground and in the southern-southeastern direction of trees.

At least 1 (one) pheromone shall be changed in a month during observation and follow-up period in pomegranate orchards and traps shall be controlled 4 (four) times in every week in summer, 2 (two) times in a month in such a way to be once in every fifteen days in spring and autumn and 1 (one) time in a month in winter and its inventory result shall be recorded.

3.1.1.1. ***If the pomegranate is a fruit fly host:*** Comply with General Directorate of Food and Control's fruit fly trapping program and APHIS' fruit fly trapping, management, and control requirements listed in the **Fruit Fly Trapping Program Appendix** to this OWP.

3.1.1.2. The commodity must be safeguarded and protected from pest infestation while in transit from the registered production site to the registered packing house.

3.1.2. Registered Packing House Safeguarding Measures and Actions

At least one trap for each pomegranate packaging facility shall be hung in entries and inside pomegranate packaging facilities and the traps shall be hung approximately 1,5-2 m higher than ground.

The traps in pomegranate facilities shall be controlled 4 (four) times in a month including every weeks during pomegranate vegetation period until Pomegranates

are completely over and data regarding control results shall be written on the table.

After harvesting, the product shall be transported to product processing and packaging facility by closed vehicles.

It shall be processed, packaged, stored and transported under the supervision of inspector or authorized technical personnel of the Directorate General of Food and Control.

Before packaging, pomegranates shall be selected, categorized and purged and then transported to USA. It will be provided that there is no insect or mite, rotten fruit, branch, leaf, stem and soil.

Packaging line of pomegranates to be exported to USA shall be used only for pomegranates and other fruit shall not be packaged in the line reserved for them in order to prevent pesticide contaminant.

The controls regarding cold treatment to pomegranate which will be exported to USA shall be carried out in an appropriate way.

- 3.1.2.1. ***If the pomegranate is a fruit fly host:*** If the commodity is not packed within 24 hours of harvest, it must be held under cold storage, or placed inside a pest exclusionary packinghouses in a segregated area and covered by an insect-proof mesh screen or plastic tarpaulin while awaiting packing.

When pomegranate palettes which will be exported to USA become ready, it should be covered by a special material to cover the whole palette, which has a characteristic of heat isolation and of which exterior part is covered with aluminum folio in order to prevent heat loss which may occur during transportation and to prevent pesticide contaminant during transportation before loading into transportation vehicle.

- 3.1.2.2. Boxes in which **fresh pomegranate fruit** are packed must be labeled with traceability data that provides information about the **registered production site** where the **fresh pomegranate fruit** originated and packinghouse where the **fresh pomegranate fruit** was processed.

- 3.1.2.3. Labeling must be of a size that clearly displays traceability information.

- 3.1.2.4. While in storage, packaged **fresh pomegranate fruit** destined to the United States or its territories must be physically separated by a minimum of 3 feet (1 meter) from all other commodities destined to domestic markets or other countries.
- 3.1.2.5. ***If the pomegranate is a fruit fly host:*** Packaged **fresh pomegranate fruit** destined to the United States must be held in cold storage and be physically separated by a minimum of 3 feet (1 meter) from all other commodities destined to domestic markets or other countries.
- 3.1.3. Phytosanitary Treatment
- Place of origin (production area), name or registration number of orchard, name or registration number of packinghouse and name or registration number of producer shall be written in English in the labels of packages belonging to pomegranates which will be exported to USA.
- Pomegranate shall be subject to preliminary cooling treatment before cold treatment. Cold treatment shall be done for pomegranates of which temperature is below +4 degree after preliminary cooling treatment.
- 3.1.4. Export Inspection and **Prior to Cold Treatment** Phytosanitary Certification
- 3.1.4.1. Inspectors shall prepare documents related to cold treatment of each container, if any and original copies of this document shall be added to Plant Health Certificate belonging to the said delivery.
- In the event that inspectors find labelling control and agricultural quarantine controls appropriate, Plant Health Certificate regarding pomegranate delivery shall be prepared.
- After examination and quarantine control is completed, inspector shall prepare a Health Plant Certificate for each pomegranate party and shall add declaration including **“This pomegranate party meets the conditions regarding pomegranates to be exported to USA and does not include pesticide subject to quarantine in USA”**.
- 3.1.4.2. ***If export inspection and Phytosanitary Certification takes place at the packinghouse:*** Registered packing houses are required to notify **General Directorate of Food and Control** of their fruit packing schedules to plan for necessary phytosanitary export certification activities.



- 3.1.4.3. The **General Directorate of Food and Control** inspector must inspect all lots for export and verify that **fresh pomegranate fruit** have originated from and been processed at registered and approved production sites and packinghouses.
- 3.1.4.4. A lot is defined as the shipment of a single commodity sent from a single production site to a packinghouse in one day.
- 3.1.4.5. The **General Directorate of Food and Control** inspector will randomly select 150 **pomegranate fruit** per lot for a 95 percent confidence level of detecting a 2% pest population and visually inspect for the presence of pests or indications of pest damage, using a magnifying glass or other inspection tools if necessary.
- 3.1.4.6. All suspect or damaged fruit will be cut, or a minimum of 30 fruit per lot, whichever is more, to detect the presence of internal pests.
- 3.1.4.7. Any insect pests must be identified to species level. Any organism found which either cannot be identified to species or whose quarantine significance is unknown will be considered quarantine significant for regulatory purposes and not allowed for export under this work plan.
- 3.1.4.8. Inspection results, including traceability information for the sample, sample size, number of fruit cut, and pest and disease findings, if any, must be recorded. Inspection records will be provided to APHIS upon request.
- 3.1.4.9. Only lots passing inspection will be eligible for export and Phytosanitary Certificate issuance by **General Directorate of Food and Control (Agricultural Quarantine Directorates, Provincial and District Directorates of Food, Agriculture and Livestock)** (Agricultural (Refer to FAVIR for appropriate additional declarations.))
- 3.1.4.10. The detection of live quarantine pests in or on fruit inspection activities will result in rejection of the entire lot belonging to/associated with the inspected sample. Reconditioning and re-sampling is not permitted.
- 3.1.4.11. The detection of leaves, branches or other non-quarantine contaminants in consignments during export inspection activities are eligible for reconditioning, resampling, and re-inspection for export.
- 3.1.4.12. Additional actions to take based on quarantine pest detections are detailed in [Noncompliance, Suspension, and Termination](#).
- 3.1.4.13. Lots rejected for export to the continental United States and its territories must be immediately removed. If removal cannot occur immediately, the lot must be covered with insect-proof mesh or tarpaulin or be stored in a dedicated cold chamber until disposal or removal arrangements are made.

3.2. Measures and Actions Applied in the United States



- 3.2.1. All consignments are subject to port of entry clearance, which may include physical inspection and fruit cutting to verify freedom from quarantine pests, upon arrival in the United States Continental or Territories.
- 3.2.2. Any safeguards found not intact or paperwork errors may cause clearance delays and if not resolved, rejection of the consignment for entry.
- 3.2.3. Actions to take based on quarantine pest interceptions are detailed in Section 4. [Noncompliance, Suspension, and Termination.](#)

4. Non-compliance, Suspension, and Termination

- 4.1. Any **registered producer/production site**, registered packinghouse, or exporter found not in compliance with the conditions of this work plan as determined by **General Directorate of Food and Control** and/or APHIS may be denied registration, approval, export certification services, and/or continued participation in this program depending on the infraction.
- 4.2. Actions to take based on detection of a quarantine pest(s) either during pre-harvest inspection or export inspection and phytosanitary certification activities in **Turkey**:
 - 4.2.1. Upon the first detection, the **General Directorate of Food and Control** will temporarily suspend the **registered producer/production site**, from exporting fruit until an investigation has been conducted by the **General Directorate of Food and Control** and remedial actions have been effectively applied.
 - 4.2.2. Upon multiple detections (on two or more separate lots from the same **registered producer/production site** in the same shipping season):
 - 4.2.2.1. The **General Directorate of Food and Control** will immediately suspend the the **registered producer/production site** from participation in the program and notify APHIS of the suspension.
 - 4.2.2.2. An investigation must be conducted by the **General Directorate of Food and Control** to determine where/why infestation has occurred.
 - 4.2.2.3. APHIS may elect to participate in the investigation.
 - 4.2.2.4. The production site must implement any remedial actions to prevent recurrence as recommended by **General Directorate of Food and Control** and/or APHIS prior to re-instatement;
 - 4.2.2.5. **General Directorate of Food and Control** will provide a report of findings, remedial action, and participant status to APHIS.
 - 4.2.2.6. The suspension remains in effect until **General Directorate of Food and Control** and APHIS jointly determine that the pest risk has been mitigated.



- 4.3. Actions to be taken based on noncompliance detected during U.S. port of entry clearance:
 - 4.3.1. Interceptions of any live quarantine pest(s) may result in rejection of the consignment upon entry if no quarantine treatment or other mitigation measure is available.
 - 4.3.2. APHIS will notify **Turkey** via notice of noncompliance;
 - 4.3.3. Upon the first detection of a quarantine pest, procedures in 4.2.1 above will apply.
 - 4.3.4. Upon multiple detections (on two or more separate consignments from the same **registered producer/production site** in the same shipping season), procedures in 4.2.2 will apply.
- 4.4. Repeated or recurring incidents of noncompliance based on the part of multiple program participants may be cause for program suspension pending a joint APHIS- **General Directorate of Food and Control** program review, which may include a site visit.
- 4.5. Either signatory party reserves the right to voluntarily withdraw from this work plan. Withdrawal will result in temporary suspension of all exports of **fresh pomegranate fruit** from **Turkey** to the continental United States and its territories until such time that new or revised work plan conditions are agreed to, documented, and signed by all parties.

5. Program Audit, Review, and Implementation

- 5.1. **General Directorate of Food and Control** will periodically audit program operations to ensure that all activities are conducted effectively in accordance with this work plan and applicable APHIS and **General Directorate of Food and Control** policies and regulations.
- 5.2. APHIS reserves the right to request program review, which may include a site visit. APHIS costs associated with these reviews may be supported by Industry via a Cooperative Services Agreement and cost recovery mechanism.
- 5.3. Cooperator representatives may be included in the review which will be scheduled and coordinated with **General Directorate of Food and Control**.