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

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

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 (T.R.), Ministry of Agriculture and Forestry (MinAF), 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:

Director
Phytosanitary Issues Management
USDA – APHIS – Plant Protection and Quarantine

_____ Date

On behalf of Republic of Turkey:

_____ Date

Director General
Republic of Turkey (T.R.) Ministry of Agriculture and Forestry (MinAF)
General Directorate of Food and Control

1. Program Overview

1.1. Commodities included in this program:

1.1.1. *Punica granatum* L. (Pomegranate)

Variety names: Hicaz, Caner, Wonderful

Growing season: May through October

Harvest season: August until mid-November

1.2. Regulated Pests:

1.2.1. Pomegranate quarantine insects present in Turkey:

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

Cryptoblabes gnidiella Mill,

Deudorix livia (Klug)

Lobesia botrana Denis & Schiffermüller

Euzophera bigella Zeller

Cacoecimorpha pronubana Hübner

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 (T.R.) Ministry of Agriculture and Forestry, General Directorate of Food and Control (Agricultural Quarantine Directorates, Provincial and District Directorates of Agriculture and Forestry)

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 4 - (7 CFR 319.56-4).

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 Agriculture and Forestry 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. 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.

- 2.2.7. 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 APHIS Commodity Import Requirements (FAVIR—ACIR)’ entry for fresh pomegranate fruit from Turkey to determine the specific language required for Additional Declaration(s). FAVIR—ACIR may be found at: <https://epermits.aphis.usda.gov/manual>. <https://acir.aphis.usda.gov/s/>
 - 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. Maintain for at least three years all documentation related to noncompliance and corrective actions taken and provide to APHIS upon request.
- 2.3. General Directorate of Food and Control will:
- 2.3.1. Maintain up-to-date knowledge of the phytosanitary requirements established by APHIS and General Directorate of Food and Control, Turkey, and comply with the conditions of this OWP, APHIS regulations and policy, and General Directorate of Food and Control’s regulations and policies for the export of fresh pomegranate fruit to the United States.
 - 2.3.2. Cooperate with APHIS and the General Directorate of Food and Control to maintain the phytosanitary integrity of the program and
 - 2.3.3. Notify the General Directorate of Food and Control of any irregularities detected during program operations which may pose a phytosanitary risk to export of fresh pomegranate fruit.
 - 2.3.4 Allow access to the production, packing, warehouse and facilities used for the production, processing and export of fresh Pomegranate fruit to the United States

and allow access to all records and documents relating to the operations of the program.

- 2.3.5. Register production sites and packinghouses with General Directorate of Food and Control prior to the start of the export season.
- 2.3.6. Comply with General Directorate of Food and Control's fruit fly trapping program and APHIS's fruit fly trapping, management and control requirements listed in the **Fruit Fly Trapping Program Appendix** to this OWP.
- 2.3.7. Ensure that all boxes or packaging for export have information or codes for the production, packinghouse, and origin of the product.
- 2.3.8. Bear the costs of APHIS personnel providing oversight when it is deemed necessary to audit the fresh pomegranate fruit export program, as well as to provide to General Directorate of Food and Control the total costs associated with certification activities of production, packaging and shipment inspection sites, among others.

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 the United States.

Official or authorized officers of the Directorate of Food and Control shall follow ISPM 26 guidelines on Mediterranean fruit fly management, such as trap placement.

The measures and procedures followed in each production unit will include:

- Fruit trees, such as peach, fig, Trabzon date palm, and pomegranate, will not be newly planted adjacent to existing orchards.
- Collection and proper disposal of fallen fruit.
- Removal of all fruit remaining on each tree after harvest.
- Monitoring for the Mediterranean fruit fly will include trapping as per Section 3.1.1.

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 pomegranates will be exported to the United States. The traps will be placed approximately 1.5-2 m high from the ground, and in the southern-southeastern direction of trees.

At least 1 (one) pheromone trap will be monitored monthly during the winter months, every two weeks or twice a month (every 15 days) during the spring and fall, and every week or four times a month during the summer.

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.

3.1.1.1. 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 at entrances and inside pomegranate packaging facilities and the traps shall be hung approximately 1.5-2 m height from ground.

The traps in pomegranate facilities shall be checked 4 (four) times a month including every week during the pomegranate growing season until the harvest period for pomegranates is complete, and data regarding control measures shall be recorded in a table format.

After harvesting, the pomegranates will be transported to product processing and packaging facility in sealed containers or closed vehicles.

The pomegranates will be processed, packaged, stored, and transported under the supervision of the inspector or authorized technical personnel of the Turkey Directorate General of Food and Control.

Before packaging, pomegranates will be sorted, selected, categorized, and culled, and then exported to the United States. Each shipment will be inspected to ensure freedom from insects or mites, rotten fruit, branches, leaves, stems, and soil.

Selected packing lines at each packing house will only process pomegranates to be exported into the United States, and no other fruit will be packed on these reserved lines in order to prevent pest contamination.

Cold treatment procedures for pomegranates exported into the United States will be properly conducted.

- 3.1.2.1. If the commodity is not packed within 24 hours of harvest, then it must be held under cold storage conditions, 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.

Pallets of packed pomegranates for export to the United States will be covered by material to cover the entire pallet, which has a characteristic of heat isolation and of the exterior part of the material is covered with aluminum foil in order to prevent heat loss which may occur during transportation and to prevent pest contamination during transportation before loading into the 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 for 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. Packaged fresh pomegranate fruit destined for 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 the orchard, name or registration number of the packinghouse, and name or registration number of the producer shall be written in English on the labels of packages belonging to pomegranates which will be exported into the United States.

Pomegranate shall be subject to a pre-cooling treatment before cold treatment. Cold treatment shall be done for pomegranates of which temperature is at or below 1.11-2.22 degrees C (depending on the exposure period) after pre-cooling treatment. If the pulp temperatures have not reached the required pre-cooling temperature, then the pomegranate shipment will remain in the pre-cooling location until the correct temperature has been reached.

3.1.3.1 All fresh pomegranate fruit exported into the United States will undergo cold treatment in accordance with the treatment schedule T107-a, for *Ceratitidis capitata*.

3.1.4. Export Inspection and Prior to Cold Treatment Phytosanitary Certification

- 3.1.4.1. Inspectors shall prepare documents related to cold treatment for each container, and original copies of this document shall be added to the Phytosanitary Certificate for each consignment.

After examination and quarantine control is completed, inspector shall prepare a Phytosanitary Certificate for each pomegranate shipment with the following additional declaration: This consignment of pomegranates has been produced in accordance with the operational work plan.

- 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. Registered packing houses must have pre-cooling facilities at the location prior to presenting the consignment to the General Directorate of Food and Control for inspection and certification.

- 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 Agriculture and Forestry) (Agricultural (Refer to [FAVIR-ACIR](#) 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. The 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 the General Directorate of Food and Control.

Fruit Fly Trapping Program Appendix

The General Directorate of Food and Control will be responsible for the *Ceratitits capitata* (Mediterranean fruit fly, or Medfly) integrated management program conducted in orchards approved to produce pomegranates for export to the United States. The program will include Medfly monitoring and control activities that will determine the initiation of chemical treatments to reduce fly population's levels below an acceptable level. The Medfly mitigation field program will be operated by the General Directorate of Food and Control and/or approved pomegranate orchard growers for export to the United States. Fruit fly orchard control will be implemented according to the following guidelines:

1. The General Directorate of Food and Control will determine the areas to be protected and they will be responsible for the placement and management of traps, counting both the number of traps in service and the number of flies per trap serviced, treatments, etc. in those areas.
2. The General Directorate of Food and Control will place one APHIS-approved trap and one Medfly lure every 200 hectares (2 square kilometers) of production area.
3. At least one trap will be installed in each orchard or if its area is less than 20 hectares (0.2 square kilometer). The trap will be placed in the center of the orchard.
4. The program traps will be installed, as a minimum, 6 weeks before the beginning of the harvest and will remain in place and serviced until harvesting is complete. The number of trapped flies will be counted weekly.
5. Orchard treatments will be a part of the plan. Starting four weeks before harvest, treatments will be applied (by the grower) when the number of trapped flies reaches the designated trigger number within an orchard. The treatments will be applied every 10-14 days, from the moment the trap counts are greater than 0.5 flies per trap/day (FTD>0.5) within the orchard. The bait sprays should start and be maintained through harvesting or for at least one Medfly life cycle (approximately 45 days) is achieved.
6. Approved Medfly Treatments. Approved treatments will be applied by land or using mass trapping. Treatments will be applied in those orchards in which the traps count are greater than 2 flies per trap/day (FTD>2). When the traps count of an orchard is greater than 3 flies per trap/day (FTD>3), all the orchards will be eliminated for export to the United States. Treatments will include the following:
 - a. APHIS-approved treatments will be utilized following established General Directorate of Food and Control requirements. Treatments may be applied via aerial or ground applications following chemical label guidelines for production area coverage. Treatments will be made at 7 day intervals, but not to exceed 10 days.
 - b. Other Approved Chemicals: Bait treatments applied using other approved pesticides at the rate specified by the General Directorate of Food and Control Medfly Management Program.