To illustrate the workload, volume of certain categories approaching the United States on an annual and daily basis was provided:

- Approximately 1,000,000 international aircraft/year; about 2,740/day;
- Approximately 58,500 international vessels/year; about 160/day;
- Approximately 13,000,000 loaded containers (rail, truck, air, sea) per year; about 35,600/day; and,
- Approximately 413,000,000 international passengers/year; about 1,100,000/day with about 358,000/day (of the 1,100,000 number) via international airports.

ISPM-15 has been in implementation for thirteen (13) years, since 2006.

Over the past three (3) years, for all non-compliant wood packaging material (WPM) instances recorded, an average of 70% of the non-compliance was attributed to having no ISPM-15 marking (stamp). The remaining 30% of the non-compliance instances recorded, on average, were attributed to WPM associated directly with a regulated pest.

Regarding commodities associated with the WPM non-compliance instance:
- Over 78% of the instances were classified as miscellaneous commodities;
- Approximately 20% of the instances were classified as plant (fruit & vegetable) (Title 7CFR); and,
- About 2% of the instances were classified as animal product/by-products (Title 9CFR).

The WPM non-compliance was principally associated with dunnage, bracing, and pallets.

For FY2019, the breakdown by regulated arthropod family of timber pest, for the 30% of the non-compliant WPM:
- 54% – Cerambycid
- 28% – Curculionid
- 10% – Siricid

FY2019 was the second year of the policy change to assess a penalty for WPM non-compliance. The instances of WPM non-compliance were principally associated with dunnage and bracing, but also included pallets via palletized cargo. Penalties are normally assessed for two specifications: WPM non-compliance, and Emergency Action Notification non-compliance.

CBP has embarked on a more robust outreach campaign to continue to address non-compliance of all categories (WPM, pest presence, carrier/container contamination, cargo contamination, lack of documentation, etc.). This includes a novel approach at incorporating the agricultural security-related instances into our trusted trader platform. CBP has initiated an education/awareness campaign for trade, industry, affiliated associations, CBP employees, and international partners. USDA-APHIS has assisted in compiling our training and awareness material.

Submitted by: Kevin C. Harriger, Executive Director
U.S. Customs and Border Protection
Office of Field Operations
Agriculture Programs and Trade Liaison