

HACCP

**Hazard Analysis & Critical Control Point
Planning to Prevent the Spread of Invasive Species**

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Table of Contents

Acknowledgements	ii
Chapter 1: Invasive Species Impacts	1
Chapter 2: What is HACCP?	7
Chapter 3: Case Studies: When HACCP Could Have Helped	13
Chapter 4: HACCP Planning	17
Step 1 – Activity Description.....	17
Step 2 – Activity Flow Chart	22
Step 3 – Potential Non-Targets	27
Step 4 – Non-Target Analysis Worksheet.....	31
Step 5 – Non-Target Risk Action Plan (NTRAP).....	45
Chapter 5: Implementing HACCP	57
Chapter 6: Glossary	59
Chapter 7: References	63
Appendix A: Blank HACCP Forms	81
Appendix B: Example HACCP Forms (Completed)	86
Appendix C: Risk Assessment Diagrams	96
Appendix D: Critical Control Point Decision Tree	99

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Chapter 1

Invasive Species Impacts

Learning Objectives:

At the end of Chapter 1, participants will be able to:

- Identify invasive species impacts.
- Define invasive species (and synonyms).
- Define target, non-target, pathway, and vector.
- Identify local and global invasive species pathways.
- List key invasive species legislation

Invasive Species Defined

Several terms are used to describe organisms living outside their native range including invasive, non-indigenous, exotic, non-native, alien, and nuisance. The Nonindigenous Aquatic Nuisance Prevention and Control Act (NANCPA) of 1990 defined “nonindigenous species” as any species or other viable biological material that enters an ecosystem beyond its historic range.” The term is often used interchangeably with “alien”, which was defined by Executive Order 13112 as “any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native” to the particular ecosystem in which it is found. The terms are also synonymous with non-native, and exotic.

NANCPA further defined an aquatic “nuisance” species as a nonindigenous species that “threatens the diversity or abundance of native species or the ecological stability of infested waters, or commercial, agricultural, aquacultural or recreational activities dependent on such waters.” Similarly, Executive Order 13112 defined invasive species as an alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health. Thus, invasive and nuisance species are synonymous and can be used interchangeably.

Key Definitions:

Invasive Species – a non-indigenous organism whose introduction does or is likely to cause economic or environmental harm or harm to human health.

Non-indigenous Species – an individual, group, or population of a species that is introduced by human intervention into an area or ecosystem outside of its historic native geographic range. Synonymous with “alien,” “non-native,” “exotic,” and “introduced.”

Chapter 1: Invasive Species Impacts

HACCP Planning to Prevent the Spread of Invasive Species

Invasive Species Impacts

No matter what you call them, invasive species are a growing problem. In 2010, Sam Hamilton, former Director of the U.S. Fish & Wildlife Service, said that invasive species are “probably the single greatest threat in our country to our native wildlife.”

Invasive species impact our environment and the diversity of life on our planet in many ways. The ecosystems into which these organisms are introduced often lack the conditions that limit range expansion in their natural habitats (e.g., predators, pests, or diseases). This factor, accompanied by characteristics such as high reproductive rates, the ability to utilize a variety of resources, and wide tolerance to a range of environmental conditions, allow invasive species to spread quickly following introduction, often resulting in serious impacts to the environment. Consequences of invasion include the extinction of native species and alteration of ecosystem processes.

In addition to the severe and permanent damage to the habitats they invade, invasive species also hinder economic development. Nationwide the cost to manage invasive species has exceeded billions of dollars. Cost estimates are often underestimated as they usually do not consider ecosystem health or the aesthetic value of nature, which can influence tourism and recreational revenue. Estimating the economic impact associated with invasive species is further complicated as monetary values are difficult to estimate for species extinctions or loss of native biodiversity and ecosystem services.



Zebra mussels attached to a native freshwater mussel.
Photo Credit: USFWS

Additionally, invasive species can be vectors of human disease. Throughout recorded history, epidemics such as malaria, yellow fever, typhus, and bubonic plague have been spread by the movement of non-indigenous organisms. Waterborne disease agents, such as cholera bacteria (*Vibrio cholerae*), can be transported in the ballast water of ships. Invasive species effects on public health extend beyond the immediate effects of disease and parasites, as chemicals used to control invasive species can pollute soil and water. Other invasive species, including invasive mussels, may increase human

and wildlife exposure to organic pollutants such as polychlorinated biphenyls (PCBs), as these toxins accumulate in their tissues and are passed up the food chain.

Chapter 1: Invasive Species Impacts

HACCP Planning to Prevent the Spread of Invasive Species

Pathways

Invasive species can spread through many different **pathways** and **vectors**, but most species that are considered invasive in North America arrived as a result of human activity. For example, it is widely accepted that zebra mussels, *Dreissena polymorpha*, were introduced to the Great Lakes through ballast water discharge by ships arriving from foreign ports. Shippers did not intend to move zebra mussels when using ballast water to safely cross the ocean and manage cargo loading/unloading. Unfortunately, many species can survive transoceanic trips in ballast water, essentially “hitchhiking” to new ports. Likewise, the horticultural industry has inadvertently provided pathways by which plant pests have been imported to the United States, causing problems in agricultural and natural areas. Some of our worst insect invaders, such as the Formosan termite (*Coptotermes formosanus shiraki*) arrived in packing and crating materials. These are just a couple of examples of how species are moved around the planet unintentionally. However, the problem is ubiquitous and all too common.

Key Definitions:

Pathway – an activity or process through which a species may be transferred to a new location where it could become invasive (e.g., shipping, air travel).

Vector – the specific means by which an invasive species moves within a particular pathway (e.g., a ship, agricultural products, boots).

On a local scale, invasive species can be spread unintentionally to new habitats through a wide variety of human activities, including work in natural resource management. For example, the tiny size of the New Zealand mud snail (*Potamopyrgus antipodarum*) and its ability to clone itself help this species hitchhike to new habitats on **vectors** such as waders, boats, and other aquatic gear. Similarly, terrestrial species can be moved via field or farm equipment, clothing, and/or native species that are moved to new areas for conservation purposes. Species monitoring, natural resource surveys, and stocking of fish are all potential pathways for moving invasive species during natural resource management activities. Because invasive species are not the “target” of these activities, we can refer to them more generally as “**non-targets**.”

Chapter 1: Invasive Species Impacts

HACCP Planning to Prevent the Spread of Invasive Species

Key Definitions:

Target – anything that is intentionally moved. For example, if your management activity calls for you to stock largemouth bass, then your targets would be largemouth bass and any equipment and personnel used to carry out this activity.

Non-target – anything, including any organism, that is not intentionally moved. For example, if your management activity calls for you to stock largemouth bass, then any other species of fish (or other organism) would be a non-target. Your intent would be to only move largemouth bass.

HACCP Spotlight: Target vs. Non-target



Invasive purple loosestrife at Montezuma National Wildlife Refuge. John and Karen Hollingsworth, USFWS.

The use of “target” and “non-target” in HACCP can be confusing to those involved in control of weeds and other invasive species. For pesticide applications, invasive species are the “targets,” and “non-targets” are the beneficial species to be avoided. Confusion over these overlapping terms can be reduced if you remember that HACCP focuses on preventing invasions before they happen. From a prevention standpoint, we only want the targets of an activity to be moved.

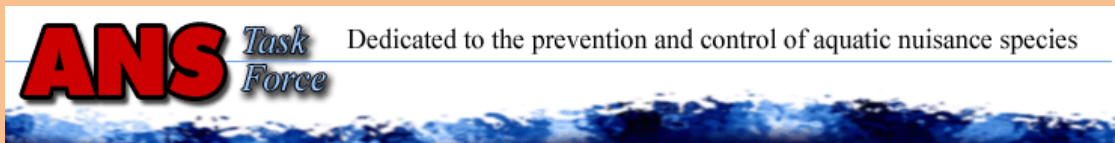
Chapter 1: Invasive Species Impacts

HACCP Planning to Prevent the Spread of Invasive Species

Invasive Species Legislation

The invasion of zebra mussels in the mid-1980s caused a surge of invasive species awareness and prompted federal legislation in the form of the Non-indigenous Aquatic Nuisance Protection and Control Act of 1990. This act was reauthorized and amended to the National Invasive Species Act in 1996. Under these federal programs, specific regulations and national management plans are dedicated to research and management of numerous species such as the Chinese mitten crab, New Zealand mud snail, killer sea weed *Caulerpa*, Asian carp, and purple loosestrife.

HACCP Spotlight: NANPCA and NISA



Congress passed the **Non-indigenous Aquatic Nuisance Protection and Control Act (NANPCA) of 1990** in response to the invasion of the zebra mussel and other species that damaged the Great Lakes. That law brought much-needed attention to the global movement of aquatic species. It also established the federal interagency Aquatic Nuisance Species Task Force, which became a key resource for regional and state efforts. The 1990 law's strictest and most detailed provisions required that ships headed for the Great Lakes exchange their ballast water at sea. The law was reauthorized, renamed the **National Invasive Species Act, or NISA**, and expanded in 1996. Then all ships arriving from outside the 200-mile U.S. Exclusive Economic Zone were encouraged to exchange their ballast water but required to report whether they had. NISA also authorized important research and linked its results to decisions about whether further ballast water regulation was needed.

In February 1999, Presidential Executive Order 13112 created the National Invasive Species Council and the Invasive Species Advisory Committee in response to growing concern over all taxa, including aquatic and terrestrial invasive species. This Executive Order states that “each federal agency whose actions may affect the status of invasive species shall, to the extent practicable and permitted by law...not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere unless, pursuant to guidelines that it has prescribed, the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.”

Chapter 1: Invasive Species Impacts ***HACCP Planning to Prevent the Spread of Invasive Species***

In December 2016, Presidential Executive Order 13571 amended Executive Order 13112 and directs agencies to continue coordinated Federal invasive species prevention and control efforts. This order:

- Maintains the National Invasive Species Council (Council) and the Invasive Species Advisory Committee
- Expands the Council's membership clarifies its operations
- Incorporates considerations of human and environmental health, climate change, technological innovation, and other emerging priorities into Federal efforts to address invasive species
- Strengthens coordinated, cost-efficient Federal action.

These broad directives have implications for non-federal agencies as well, particularly those working in partnership with federal agencies. But, it also raises risk-management questions. What is practicable? What are feasible and prudent measures to minimize risk of harm? HACCP can help provide the answers.

Understanding pathways and developing plans to remove non-target species and prevent biological contamination is necessary to prevent invasive species impacts. When it comes to natural resource management activities, species introductions should not be considered "accidental." It is our responsibility as resource professionals to strive to do no harm. Understanding invasive species pathways and developing plans to remove hitchhiking species are necessary to prevent unintended spread of species.

***Remember, if you are not part of the solution,
then you are part of the problem.***

Chapter 2

What is HACCP?

Learning Objectives:

At the end of Chapter 2, participants will be able to:

- Explain why "planning is essential"
- Describe the five steps of HACCP Planning.
- Explain the benefits of a strong HACCP Planning team.

What is HACCP?

Hazard Analysis and Critical Control Point (HACCP) Planning is about risk management. It features five integrated steps that can reduce the risk of spreading invasive species and other non-targets via human-based pathways. HACCP examines activities to determine if and when invasive species might be unintentionally moved. Where this potential exists, the tool helps to identify the most effective opportunities during an activity to reduce that risk and the specific **control measures** that are needed. Safeguards are included through the use of **Prescribed Ranges, Limits, or Criteria** (PRLC, previously called a control limit) and **corrective actions** that ensure that control measures (also known as preventive measures) are operating as intended. Control measures, PRLC, and corrective actions will be discussed in more detail in later chapters.

Chapter 2: What is HACCP?

HACCP Planning to Prevent the Spread of Invasive Species

Key Definitions:

Control Measure – an action that can be used to control a potential hazard (sometimes referred to as a preventive measure). Control measures are the first, and sometimes only, line of defense against the spread of non-targets. If control measures fail, corrective actions should be implemented.

Prescribed Range, Limit, or Criterion (PRLC) - (previously called a “control limit”) – a specific measurable attribute that can be used to determine if control measures are effectively minimizing the risk (e.g., a minimum dose of a disinfectant, a minimum exposure time, or an acceptable range of temperatures).

Corrective Action - a procedure that must be followed if a control measure fails at a critical control point. A corrective action is backup procedure used as a second line of defense that may be necessary to prevent the spread of a non-target if the first-line defense (a control measure) fails to control a non-target.

The Origins of HACCP

HACCP has been around for decades and has its roots in the food industry. The Pillsbury Company pioneered the HACCP concept in the early 1960s in partnership with NASA as a way to combat food contaminants in the food supply for the U.S. space program. Since then, HACCP has been recognized and used around the world as a proactive method to ensure product purity. HACCP planning is widely used and accepted by industry for good reason: It works!

The National Sea Grant Program first adapted HACCP to reduce the risk of spreading aquatic invasive species and help fish processors comply with federal seafood safety regulations. The U.S. Fish & Wildlife Service has since widely adopted this method and developed many HACCP plans for fish hatcheries, watershed surveys, fish passage projects, and other natural resource management activities. Use of HACCP to prevent the spread of invasive species has even become an American Society for Testing and Materials (ASTM) International standard under the Standard Guide for Conducting Hazard Analysis-Critical Control Point Evaluations (ASTM E2590-09).

Chapter 2: What is HACCP? *HACCP Planning to Prevent the Spread of Invasive Species*

Planning Is Essential

Like many plans, a large part of the value of developing a HACCP plan is the planning process itself. While examining their planned actions in detail, planners will reveal new questions and insights that can identify unrecognized prevention opportunities. The time and effort used to develop a HACCP plan will reduce the likelihood of unintended invasions that could negate any benefits from the original work. Therefore, through proper HACCP planning, natural resources will be better protected.

To be successful, HACCP planning requires commitment from agency heads, managers, and field staff. Involving this range of participants in HACCP plan development not only ensures a comprehensive analysis of a specific activity and its risks but promotes the “buy-in” necessary to assure effective implementation.

Planning is nothing new for biologists and managers, but applying HACCP planning to natural resource work may be a relatively new concept for some. Without appropriate planning, the management work that takes biologists, technicians, and their equipment to many different habitats could be pathways for invasive species spread. HACCP planning is a tool that manages the risk of moving non-targets in natural resource management activities.

HACCP identifies high-risk activities and focuses attention on those actions needed to reduce non-target movement. Plans documenting risks and methods used to remove non-target species give managers the opportunity to weigh such risks for species spread against benefits from natural resource actions. For some pathways, the risks may outweigh resource benefits until better procedures to detect and remove non-target species are identified.

HACCP planning provides a systematic method to make consistent decisions based on identified risks. HACCP plans also create a reference source to document best management practices and standard operating procedures that can be shared with other offices, agencies, and the private sector to reduce the risk of species spread through pathways with similar characteristics.

First-time HACCP planners often identify only well-known invasive species as non-targets to remove from pathways. While these species deserve increased attention, biologists recognize that many local species could become invasive if introduced outside their native range. HACCP planning for natural resource pathways is intended to reduce the risk from all non-target species, following the **precautionary principle**.

Chapter 2: What is HACCP? *HACCP Planning to Prevent the Spread of Invasive Species*

HACCP Spotlight: The Precautionary Principle



Invasive brown tree snake (Boiga irregularis). Photo credit: Gordon H. Rodda, USGS.

The precautionary principle states that if an action could plausibly cause harm, but there is not yet a scientific consensus that the action is actually harmful, the burden of proof that such an action is not harmful falls on those taking the action. The precautionary principle implies a social responsibility to protect the environment from exposure to harm when careful consideration has found a plausible risk. This protection can be relaxed only if scientific findings emerge that provide sound, convincing evidence that no harm will result.

Using the precautionary principle, HACCP focuses on potential or known invasive species, but also includes species not yet known to be invasive. History demonstrates that many invasive species do not reveal their invasiveness until long after an introduction occurs; therefore caution should be practiced in the context of uncertainty.

"Always have a plan and believe in it. Nothing happens by accident."
(Chuck Knox, Football Coach)

Chapter 2: What is HACCP?
HACCP Planning to Prevent the Spread of Invasive Species

The Five Steps of HACCP Planning

1. **Describe the activity:** The activity description includes specific information such as the who, what, when, where, how, and why of the project. The description offers a historical, working reference to facilitate plan review and communication with facility staff and other resource management personnel.
2. **Chart the flow of tasks for the activity:** This step provides an important visual tool that the HACCP team can use to complete the remaining steps of the plan. Here, a clear and concise, yet complete description of the tasks necessary to complete the overall activity is diagramed in a linear fashion.
3. **Identify potential non-targets:** Any species that has a reasonable potential to be moved or introduced to new habitats should be identified to implement appropriate control measures to prevent an unintended invasion. These may include vertebrates, invertebrates, plants, or other organisms (e.g., diseases, pathogens, and parasites).
4. **Analyze the risk of moving non-targets:** It is crucial to identify significant non-targets with respect to each required task within a larger activity so that effective measures to control them may be employed. During the analysis, the significance of each potential non-target is assessed by considering its risk of being moved within each individual task.
5. **Completing the action plan:** The action plan addresses specific methods to control risks of non-target species. It lists specific information about controls, monitoring procedures, methods for evaluation, and corrective actions.

Each of the above steps corresponds to a specific form in the HACCP process, and each step builds on prior steps. Blank forms are included in Appendix A.

Starting Out in the Right Direction

A successful HACCP program depends on the firm foundation of management commitment, HACCP training, and assembly of an effective HACCP team. Attempting to implement a HACCP program without these components will likely lead to HACCP planning that lacks a thorough assessment of the potential non-targets and commitment to apply the plan in the field.

Management Commitment - For HACCP planning to work, it is considerably important to have the support of everyone in the agency, from management to the field technicians. Without support, the plan will not become an agency priority or be effectively implemented.

HACCP Training - Education and training are important elements in developing and implementing a HACCP program. Employees who will be responsible for the HACCP program must be adequately trained in its fundamentals. HACCP can be a fairly

Chapter 2: What is HACCP? *HACCP Planning to Prevent the Spread of Invasive Species*

straightforward process, but incomplete understanding of key concepts can lead to incomplete plans.

HACCP Team Assembly - Assembling a team is an essential step in building a HACCP program. Although one person might be able to analyze risks and develop a plan successfully, a team approach maximizes the breadth of expertise needed to comprehensively evaluate an activity, identify all potential non-targets, and brainstorm the full spectrum of available prevention options.

HACCP Spotlight: SOP's vs. HACCP



Was an SOP in place to decontaminate this boat before launch? Photo Credit: Steve Hillebrand. USFWS.

“But I already have this covered in my standard operating procedures...”

A list of prevention measures in your standard operating procedures is a great way to reduce the spread of invasive species, but it is not the same thing as a HACCP plan. HACCP is a process that requires a team to think comprehensively about what invasive species might be introduced through all parts of an activity, analyzes the significance of those risks, identifies the most effective opportunity to reduce risks, monitors whether the risk reduction measures are working, and if they're not, provides a back-up

plan. HACCP will help you generate a list of prevention or control measures, but simply using a list without going through the HACCP process can be a shot in the dark. From this standpoint, HACCP isn't something more comprehensive than a list of best management practices; it **is** a best management practice.

"Man often oppose a thing merely because they have no agency in planning it, or because it may have been planned by whom they dislike."

(Alexander Hamilton, Treasury Secretary under George Washington)

Chapter 3

Case Studies: When HACCP Could Have Helped

Learning objectives:

At the end of Chapter 3, participants will be able to:

- Identify target species and potential non-target species in example case studies.
- Explain how HACCP could have helped reduce the risk of invasive species introductions in two case studies.

Case study: Inks Dam National Fish Hatchery (NFH)

Inks Dam NFH is a warm-water facility operated by the U.S. Fish & Wildlife Service (Service) in central Texas. It is used for raising sport-fish for stocking throughout the Service's Southwest Region. One of the programs at Inks Dam NFH is the production of largemouth bass, which are stocked in tribal waters of Arizona. The facility pumps raw water from nearby Lake Buchanan to fill their ponds. Lake Buchanan contains a suite of warm-water fish species native to central Texas. Annually largemouth bass brood-stock are spawned in ponds. The fry from the spawning adults are separated and reared in ponds, and eventually loaded into the stocking truck and transported to Arizona or New Mexico.

Prior to the implementation of HACCP at Inks Dam NFH, shipments of largemouth bass sometimes contained non-target organisms including fish, invertebrates, and plants that were inadvertently spread to receiving waters. This caused fish-management challenges and possibly led to the establishment of invasive species in Arizona and New Mexico. In 1998, a shipment of largemouth bass from Inks Dam NFH was determined to be the source of the introduction of gizzard shad to Morgan Lake in New Mexico, an important largemouth bass sport fishery on the Navajo Reservation. Later shipments of bass transported to Morgan Lake from the hatchery were found to have as many as nine different species besides largemouth bass including Guadalupe bass, logperch, gizzard shad, white bass, bluegill, and dollar sunfish. These shipments were refused but gizzard shad were already firmly established in Morgan Lake. Morgan Lake provides water to the APS power plant near Shiprock, as a result logistics prevent shad from being chemically removed from the 1200 acre lake. Lowering the lake would require a power-plant shut-down for an extended period. Poisoning the water without lowering the lake would block intakes with dead fish and effectively shut down the power plant. Since 1998, gizzard shad have spread significantly within the Colorado River system. In 200 the invasive fish was found in Lake Powell; however the source of this introduction has yet to be officially connected to the actions of the Ink Dame NFH. At Inks Dam NFH, the pathways identified as potential sources for introduction of non-target species included the water in which the largemouth bass were raised. Water from Lake Buchanan is directly supplied to the hatchery with the possibility of moving

Chapter 3: Case Studies: When HACCP Could Have Helped *HACCP Planning to Prevent the Spread of Invasive Species*

numerous fish, invertebrate, and plant species as well as disease and pathogens. . Another potential pathway for non-targets was the water used to fill the stocking truck, which also directly from Lake Buchanan.

The HACCP plan for stocking of largemouth bass from Inks Dam NFH identified an opportunity to fill trucks with well water instead of raw lake water (a practice that



Inks Dam National Fish Hatchery is located 60 miles northwest of Austin, Texas. Photo Credit - Bob Pitman & Robert Lindsey/USFWS

continues today). Additionally, hatchery personnel now use flow-through holding tanks to remove non-target plants and invertebrates. Large-mesh dip nets are used to collect the largemouth bass while allowing the smaller non-target fish to pass through. Finally, hatchery personnel inspect all holding tanks to ensure that non-targets are removed prior to loading the fish in the stocking truck.

As a check on the effectiveness of these control measures to remove non-target species from shipments of largemouth bass, service

biologists on the receiving end inspect every shipment of fish prior to the bass being stocked. Since the HACCP plans have been implemented at Inks Dam NFH, unintended shipment of non-target organisms has effectively been minimized.

Case study: Ridgefield National Wildlife Refuge (NWR)

Ridgefield NWR, located in southwest Washington State, has a total of 5,218 acres of marshes, grasslands, and woodlands. Management objectives include preserving the natural Columbia River floodplain and providing habitat for waterfowl and other wetland wildlife. In particular, the refuge was established to secure vital winter habitat for dusky Canada geese and other wintering waterfowl. As part of wetland creation and restoration projects undertaken at Ridgefield NWR, rice screenings from the Sacramento Valley of California were spread and harrowed within borrow areas of eight wetlands that had been scraped to mineral soil during September 1999. This activity was performed in order to establish a seed source for moist-soil vegetation in areas where the seed bank was removed as a result of the scraping. Rice screenings are composed of seed and other non-rice vegetation remaining after cleaning and processing of harvested rice. These screenings are primarily composed of moist-soil plants seeds (e.g., wild millet, smart weeds) that are considered high-quality food for aquatic, migratory birds. The seed mixture applied to the refuge contained predominately wild millet, smartweeds, and an unidentified bulrush.

Chapter 3: Case Studies: When HACCP Could Have Helped *HACCP Planning to Prevent the Spread of Invasive Species*

During the spring/summer of 2000, the unknown bulrush germinated in refuge wetlands and was subsequently identified as Eurasian ricefield bulrush, a known invasive. In the Sacramento Valley, this species has become ubiquitous in wetlands and rice fields and is considered a nuisance weed. Beyond the original eight wetlands contaminated in 1999, the invasive bulrush has since infested six additional wetlands at the refuge. Because this bulrush had not been previously recorded in the Pacific Northwest, the infestation at the refuge represented an introduction of a new invasive species. Accordingly, Ridgefield NWR has established an aggressive control program. The following are potential vectors by which this bulrush seed spread to new areas: water flow in drainage and delivery ditches, farm equipment and vehicles, and transport by wildlife and humans (e.g. refuge visitors, hunters, and refuge staff). Although the actual mechanism by which this bulrush has infested additional wetlands on the refuge is unknown, the likely vector was water flow between units. Because drainage water is annually pumped from the refuge into the Columbia River, there are further risks of the bulrush escaping into additional sites within the Columbia River System.



Ridgefield National Wildlife Refuge is located just north of Vancouver, Washington. Photo Credit – Friends of the Ridgefield National Wildlife Refuge

Although it is not possible to determine with certainty whether a HACCP plan would have prevented the introduction of this invasive plant to Ridgefield NWR, HACCP would have facilitated analysis of threats from the source area and helped identify prevention measures such as seed purity protocols and quarantine procedures.

"The significant problems we face cannot be solved at the same level of thinking we were at when we created them."

(Albert Einstein, Nobel Prize Winner, Physics)

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Chapter 4

HACCP Planning

Step 1 – Activity Description

Learning Objectives:

At the end of Step 1, participants will be able to:

- Identify the essential components of a well-written Activity Description.
- Write an Activity Description encompassing all six description components.

Once a HACCP team is established, the members first describe the activity, the method of accomplishing the activity, and the intended purpose and need for the activity.

Examples of activities include, but are not limited to the following:

- Forest thinning operations
- Raising and/or stocking of fish and other organisms
- Wildland fire fighting
- Field surveys (aquatic and terrestrial)
- Habitat restoration projects
- Research field work
- Road construction and maintenance
- Trail building and maintenance
- Introducing an organism for biological control
- Landscaping
- Invasive plant removal

The HACCP Plan title and management objective should be clearly stated at the top of the Step 1 form. The management objective should state the overall goal of the activity or project to be performed. A contact person also should be identified. This person will be the point of contact for any questions regarding the HACCP plan; in most situations the contact person will be the HACCP team lead, project coordinator, or site manager.

The activity description should provide historical references and background information to help facilitate communication between staff members conducting the activity as well as other resource management agency personnel that may be involved. The activity

Chapter 4: HACCP Planning: Step 1 – Activity Description

HACCP Planning to Prevent the Spread of Invasive Species

description should be a narrative description that includes the “who, what, when, where, why and how” of a particular project:

- **Who:** The individuals (e.g., project manager, site manager, or field staff) that are responsible for managing and conducting the activity.
- **What:** A statement about what is done during the activity.
- **When:** The timing and frequency of the activity (i.e., is it a one-time occurrence or does it occur repeatedly such as maintenance, annual surveys, or seasonal fish distribution?).
- **Where:** The location(s) where the activity takes place.
- **Why:** A statement about the need and the objective of the activity.
- **How:** A general statement about the methods used to complete the activity

The Activity Description should be complete, accurate, and thorough, yet succinct. The objective is to provide enough information to allow someone unfamiliar with the activity to be able to understand the context and details of the HACCP plan, but not burden them with unnecessary details.

The form on the following page provides a consistent template for Step 1.



Fieldwork may involve intentionally moving a particular species. But, what else are you dragging along? Photo Credit: Peter Pattavina, USFWS.

Chapter 4: HACCP Planning: Step 1 – Activity Description

HACCP Planning to Prevent the Spread of Invasive Species

Chapter 4 will take you through the five steps of HACCP planning. At the end of each Step, this manual uses the following hypothetical example to demonstrate the application of HACCP concepts.

A Hypothetical Example

Throughout the year, staff members from the Cutthroat Trout National Fish Hatchery conduct monthly riparian habitat surveys to measure vegetation densities within the Thompson River Basin in Montgomery County, California. The purpose of the surveys is to gather data and information on riparian habitat to guide cutthroat trout recovery actions within the Thompson River Basin. When not in use, the specialized survey gear is stored in a warehouse on hatchery property. Surveys are begun by first retrieving all necessary gear from the warehouse at the beginning of the day. Once loaded into a pickup truck, staff members travel with the gear to the sampling site chosen for the day. After the gear is unloaded, the staff conducts the sampling activity using the appropriate gear. At the end of the day, staff members load the gear back into the truck and return to the warehouse. The gear is then unloaded and put away until needed for the next survey. Within the Thompson Basin, several potential invasive species, parasites, and diseases have been determined to be of significant concern. These include bullfrogs (*Rana catesbeiana*), New Zealand mud snails (*Potamopyrgus antipodarum*), Eurasian milfoil (*Myriophyllum spicatum*), purple loosestrife (*Lythrum salicaria*), Chytrid fungus (Phylum Chytridiomycota), and whirling disease (*Myxobolus cerebralis*).

Chapter 4: HACCP Planning: Step 1 – Activity Description
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 1 – Activity Description
Management Objective & Contact Information
HACCP Plan Title:
Management Objective:
Contact Person:
Phone:
Email:
Activity Description i.e. Who; What; Where; When; How; Why

Chapter 4: HACCP Planning: Step 1 – Activity Description
HACCP Planning to Prevent the Spread of Invasive Species

Here is an example Activity Description for the hypothetical example introduced in Chapter 4: Step 1 (page 16).

HACCP Step 1 – Activity Description

Management Objective & Contact Information
HACCP Plan Title: Hypothetical HACCP Plan
Management Objective: Survey riparian vegetation habitat based on the recovery plan for the cutthroat trout (CT).
Contact Person: Dave Britton
Phone: (800) LUV-FISH
Email: David.Britton@fws.gov
Activity Description
i.e. Who; What; Where; When; How; Why
<p>Who: Cutthroat Trout National Fish Hatchery personnel</p> <p>What: Measurement of Riparian Vegetation Density</p> <p>Where: Survey sites within the Thompson River Basin (Montgomery County, California). Water bodies include the Thompson River, Patterson River, Britton Creek, and Pasko Creek. There are 20 sites within the basin (5 per river or creek). Survey sites are 100 meters in length.</p> <p>When: Sites are sampled continuously throughout the year starting in April and ending in November. Only one site is sampled per day.</p> <p>How: Retrieve the appropriate gear from a warehouse at the beginning of the day. Travel to the sampling site. Once at the site the survey is conducted by wading down the river and taking measurements on riparian vegetation density. Once activity is complete, return to the warehouse. Gear is unloaded and stored.</p> <p>Why: To gather data and information on riparian habitat to help guide cutthroat trout recovery actions</p>

Step 2 – Activity Flow Chart

Learning Objectives:

At the end of Step 2, participants will be able to:

- Discuss the relationship between the Activity Description and the Activity Flow Chart.
- Identify all of the tasks required to complete the activity described in Step 1.
- Complete an Activity Flow Chart.

An Activity Flow Chart is a method for outlining the sequence of tasks that occur during the activity addressed by the HACCP plan. Information from the Activity Description (Chapter 4, Step 1), specifically the “how” from the narrative, is used and expanded upon to develop this sequence. The flow chart should contain a task number, title, and brief description. It is important to include all tasks within the activity, from preparation to project completion. If a task is missed, a significant non-target may not be addressed.

All tasks covered by a HACCP plan should be included in an Activity Flow Chart. If your activity includes any tasks that occur in parallel (simultaneously), then the activity is too general for a single HACCP plan. This is one of the most common mistakes made when people first start creating HACCP plans. In this case, break the activity into two or more sub-activities and create HACCP plans for each sub-activity. Each sub-activity should have its own Activity Flow Chart that contains only sequential tasks.

Tasks intended to prevent the spread of invasive species (e.g., decontamination procedures), should **NOT** be included in the Activity Flow Chart. The HACCP plan will be stronger if those tasks are not included as “tasks”, but instead are included as control measures for a related task. For example, consider a forest survey team that proactively decontaminates its vehicles upon entry and exit to a new site. Since it is part of their normal operations, the HACCP team may prepare a plan for this activity that includes the decontamination process as one of the tasks. However, the plan will be more effective if the team lists only the entry and exit to the site as tasks and later identifies the decontamination process as an associated control measure for these tasks. These two approaches may not seem much different, but only the latter allows the HACCP plan to provide valuable documentation, monitoring, and evaluation of the decontamination process and prescribed corrective actions should the decontamination process (control measure) fail. You will learn more about control measures and corrective actions in Steps 4 and 5.

Chapter 4: HACCP Planning: Step 2 – Activity Flow Chart

HACCP Planning to Prevent the Spread of Invasive Species

HACCP Spotlight: Lumpers vs. Splitters



Is this one task or multiple tasks? Photo Credit: USGS.

A Note on “Lumpers vs. Splitters”

The number of tasks required to complete the activity will depend on the activity’s complexity and whether your HACCP team consists of “lumpers” or “splitters.” If you have a team of “lumpers” (i.e. they define very broad tasks), you will have few tasks and it might be difficult to distinguish specific prevention opportunities. On the other hand, if your team identifies more than ten tasks, your team is probably splitting too much. Remember, a HACCP plan will not be effective if the tasks defined for your activity are too narrowly or too broadly defined. Be specific, yet concise.





The HACCP team should evaluate the entire activity or operation and make any changes required in the flow chart. The evaluation allows each team member to gain an overall picture of how the activity is conducted. The Activity Flow Chart is an important tool that the HACCP team will use to complete the remaining steps of the plan. In addition, an activity diagram based on the flow chart’s tasks, although optional, is a useful aide in visualizing the activity and completing the risk analysis in Step 4.

An Activity Flow Chart template is provided on the next page, followed by an Activity Flow Chart and an example activity diagram for the hypothetical example introduced in Chapter 4: Step 1 (page 16).

"A common mistake people make when trying to design something foolproof is to underestimate the ingenuity of complete fools."

(Douglas Adams, Author)




Chapter 4: HACCP Planning: Step 2 – Activity Flow Chart
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 2 – Activity Flow Chart	
Outline Sequential Tasks of Activity *	
Task 1	
Title:	
Description:	
	
Task 2	
Title:	
Description:	
	
Task 3	
Title:	
Description:	
	
Task 4	
Title:	
Description:	
	
Task 5	
Title:	
Description:	

* Add or remove boxes as needed

Chapter 4: HACCP Planning: Step 2 – Activity Flow Chart
HACCP Planning to Prevent the Spread of Invasive Species

Here is an example Activity Flow Chart that shows how the HACCP team completed Step 2 for the hypothetical example introduced in Chapter 4: Step 1 (page 16).

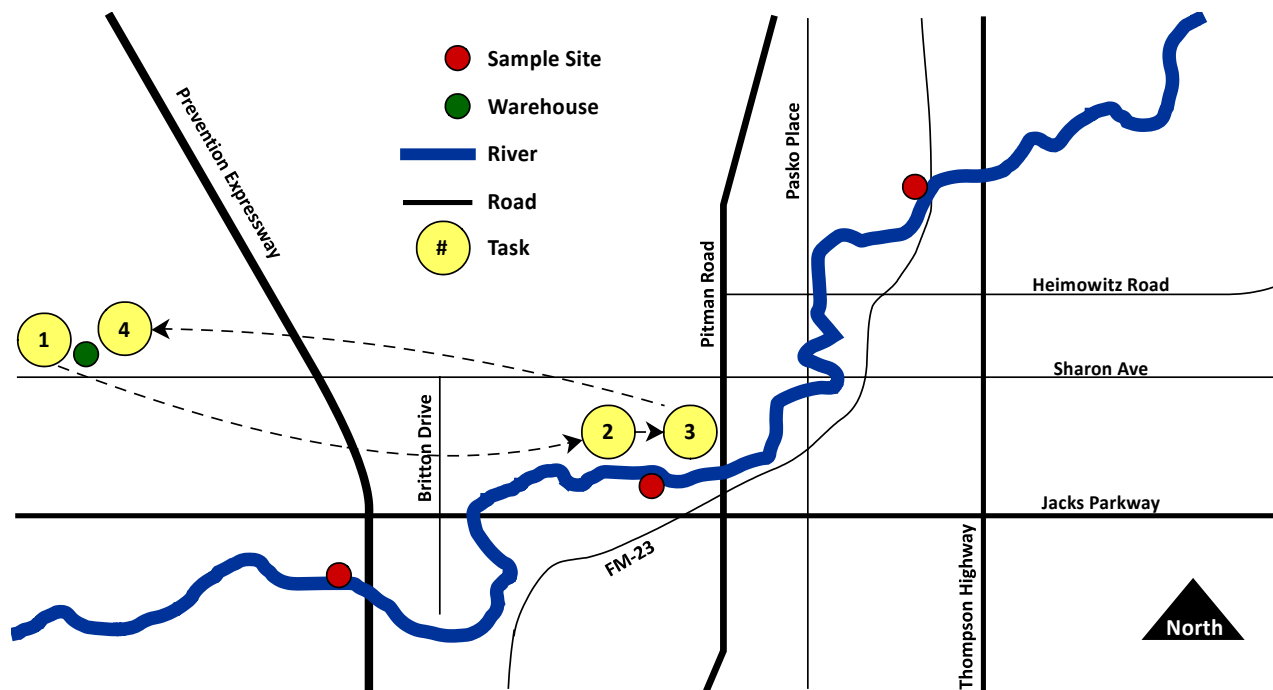
HACCP Step 2 – Activity Flow Chart	
Outline Sequential Tasks of Activity	
Task 1	
Title: Load Gear and Drive to site	
Description: Arrive at warehouse and load appropriate gear for sampling activity. Drive to sampling site.	
	
Task 2	
Title: Unload gear and conduct survey	
Description: Unload gear from vehicle. Prepare gear to conduct sampling. Conduct survey by wading down river and taking measurements on riparian vegetation density	
	
Task 3	
Title: Reload gear	
Description: Return to vehicle and pack up gear.	
	
Task 4	
Title: Return to warehouse and unload gear.	
Description: Return to the warehouse in vehicle with gear. Put equipment away to store for next use.	

Chapter 4: HACCP Planning: Step 2 – Activity Flow Chart

HACCP Planning to Prevent the Spread of Invasive Species

An Activity Flow Diagram like the one below is optional. Sometimes it is helpful to sketch the linear sequence of tasks, particularly when the tasks are conducted in more than one location. If this helps your HACCP team produce an Activity Flow Chart, then please consider using a diagram in addition to the Activity Flow Chart.

Example Activity Diagram



"Proper preparation prevents poor performance"
(Charlie Batch, Two-time Super Bowl Winning Quarterback)

Step 3 – Potential Non-Targets

Learning Objectives:

At the end of Step 3, participants will be able to:

- Discuss the difference between a target and a non-target.
- Identify the different non-target categories (Vertebrates, Invertebrates, Plants, and Other Organisms).
- Identify non-targets that potentially could be moved during your activities.
- Complete a form for HACCP Step 3.

In Step 3 of the HACCP planning process, the team needs to identify the potential non-targets that may be moved through the tasks identified in Step 2.

Remember that targets can include yourself, your gear, and/or a species that you intend to move. Non-targets are anything that you do not want to be moved from one area to another. Non-target organisms can be categorized into four general categories: vertebrates, invertebrates, plants, and other organisms (e.g., fungi or microbial pathogens). Species considered non-targets vary from state to state, agency to agency, and biologist to biologist. Your HACCP team should consider **ALL** potential non-targets that have a reasonable probability of being moved through the tasks identified in Step 2. In later steps of the HACCP planning process, you will have an opportunity to narrow down your list to the truly significant non-targets. For now, if your HACCP team is on the fence about whether something should or should not be listed as a potential non-target species, it probably *should* be listed (remember the precautionary principle). You may need to do some research or consult with local experts to determine which species should be considered non-targets (see Chapter 7 for helpful resources). Discussions about non-targets can help focus planning objectives and establish the basic foundation for each HACCP plan. In the end, the HACCP planning process may reveal non-target species that were not previously recognized as present in the activity area.

Individual species or general categories (e.g., all non-target fish species) can be used to develop this list. In general, it is acceptable to group taxa when numerous individual species have the potential to be non-targets. However, any species that are of high concern or require specific or additional control measures should be listed individually. Remember our discussion about “lumpers” and “splitters” in Step 2? This concept also applies to potential non-targets. If you need a refresher, check out the **HACCP Spotlight** on page 22.

The form on the following page provides a consistent template for Step 3.

Chapter 4: HACCP Planning: Step 3 – Potential Non-Targets
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 3 – Identify Potential Non-Targets

Non-Targets That May Potentially Be Moved/Introduced

Vertebrates:

Invertebrates:

Plants:

Other Organisms (pathogens, parasites, etc.):

Chapter 4: HACCP Planning: Step 3 – Potential Non-Targets
HACCP Planning to Prevent the Spread of Invasive Species

Here is an example that shows how the HACCP team completed Step 3 for the hypothetical example introduced in Chapter 4: Step 1.

HACCP Step 3 – Identify Potential Non-Targets
Non-Targets That May Potentially Be Moved/Introduced
Vertebrates: Amphibians Bullfrog (<i>Rana catesbeiana</i>)
Invertebrates: New Zealand Mud snail (<i>Potamopyrgus antipodarum</i>)
Plants: Eurasian milfoil (<i>Myriophyllum spicatum</i>) Purple loosestrife (<i>Lythrum salicaria</i>)
Other Organisms (pathogens, parasites, etc.): Chytrid fungus (Phylum Chytridiomycota) Whirling disease (<i>Myxobolus cerebralis</i>)

Chapter 4: HACCP Planning: Step 3 – Potential Non-Targets
HACCP Planning to Prevent the Spread of Invasive Species



Sometimes non-target species are obvious and easily spotted. Sometimes they are not. What are you moving? Photo Credit - USGS

"To be prepared is half the victory."
(Miguel de Cervantes Saavedra, Author, Poet and Playwright)

Step 4 – Non-Target Analysis Worksheet (NTAW)

Learning Objectives:

At the end of Step 4, the participant will be able to:

- Describe the relationship between Steps 1, 2, 3 and 4 of the HACCP Planning Process.
- Evaluate the significance and severity of each non-target using risk assessment.
- Define control measure, control point, and critical control point.
- Determine if a control measure action is a critical control point or an optional control point.
- Complete a Non-Target Analysis Worksheet using information from Steps 1, 2, and 3.

The Non-Target Analysis Worksheet (NTAW) is a pivotal step in the HACCP planning process because it determines if an activity poses a significant risk for moving invasive species or non-targets, and if so, what control measures can be applied to eliminate or reduce this risk to an acceptable level. As such, Step 4 is more complicated than the first three steps.

The NTAW form on the following page provides a template for Step 4. To complete the NTAW, begin at column 1. In this column, list the title of each task described in Step 2 (Activity Flow Chart). Record all potential non-targets identified in Step 3 (Potential Non-Targets) in column 2. The third column in the form asks a qualitative question: "Are any non-targets significant?" The "yes" or "no" answer is subjective. Your HACCP team will need to determine the appropriate answer by conducting a risk assessment of the potential to move non-target species for each task. Methods for conducting this risk assessment are given in the sections below.

"An ounce of prevention is worth a pound of cure."
(Benjamin Franklin, Founding Father of the United States)

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 4 – Non-Target Analysis Worksheet

1 Tasks (From Step 2)	2 Potential Non-targets (From Step 3)	3 Risk Assessment Are any non-targets significant? Yes or No	4 Justification Justify your answer in Column 3	5 Control What control measures can be applied during this task to reduce the risk of non-targets?	6 CCP? Is this task a CCP? Yes or No	7 Justification Justify your answer in Column 6
Task # Title:	Vertebrates					
	Invertebrates					
	Plants					
	Others					
Task # Title:	Vertebrates					
	Invertebrates					
	Plants					
	Others					

Analyzing the Risk of Non-Targets

Analyzing potential risk is fundamental in HACCP. Risk assessments assist in defining the risk parameters surrounding the activity described under the management objective in Step 1. Risk assessments can be extremely complicated, using significant quantitative data and mathematical models, or they can be simple and more qualitative based on the best information available and professional judgment.

Risk assessments measure the likelihood of an event occurring and the severity of negative impacts from such an event. It is often difficult to predict when an introduction of a non-indigenous species will cause ecological, economic, or human health damage; in fact some species may fail to reveal negative consequences until years after their introduction. Accordingly, the precautionary principle suggests that it is reasonable for HACCP planning to assume that a significant risk of introduction will include a significant risk of unacceptable negative effects. We are making the assumption that the risk of unacceptable negative effects is equal for all species and all situations to simplify this process. With all impacts assumed to be significantly negative, this leaves only “likelihood” to be assessed. Here likelihood is defined as the probability of moving non-target species (determined in Step 3) during individual tasks (from Step 2). HACCP makes the general assumption that significant negative impacts will occur following the introduction of a non-indigenous species as a part of the risk assessment. If necessary, the process may also include an assessment of impacts, but this assessment type is not covered within the HACCP manual.

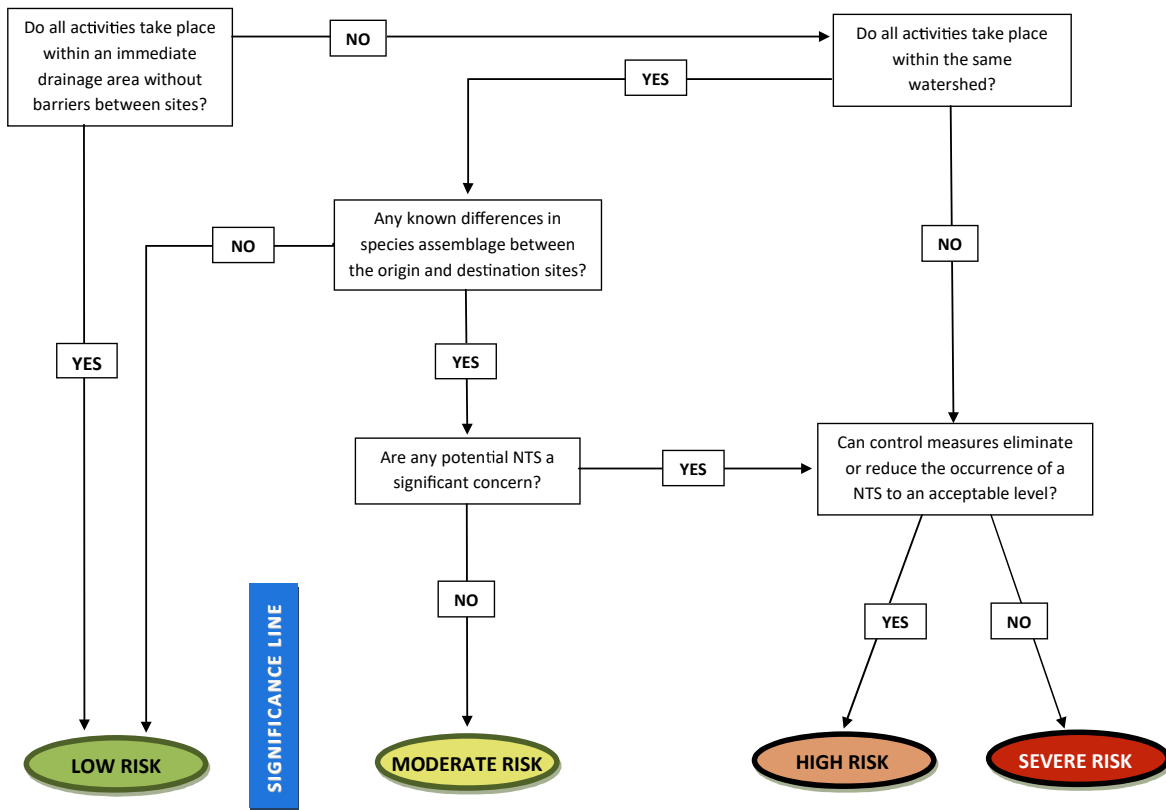
Because HACCP plans are relatively simple risk-management plans, the associated risk assessment also can be abbreviated, erring, of course, on the side of caution. It is important to keep the “big picture” in mind: the purpose of a HACCP plan is to prevent the transport of non-targets. If there is **ANY** reasonable risk of invasion, we must employ effective control measures (described in Step 4, Column 5). In some cases, a risk assessment can be as simple as an informed judgment call without using any tools other than common sense. In other cases, it may be necessary to employ some sort of analytical tools to help determine whether any potential non-targets are significant.

Remember that on the most basic level, the risk assessment is used to determine the likelihood of moving invasive species during particular tasks.

On the next page is an example of a flow diagram used for risk assessment for Aquatic Management Activities. This flow diagram references aquatic management activities, additional examples for terrestrial management and stocking activities are available in Appendix C).

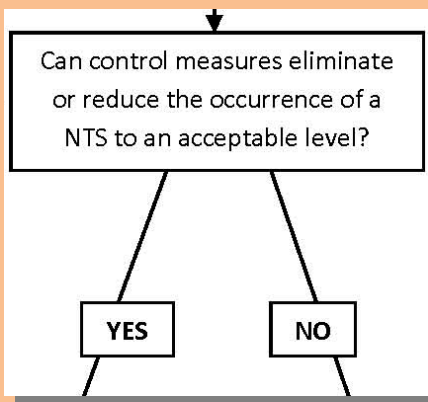
Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW)
HACCP Planning to Prevent the Spread of Invasive Species

Example of Risk Assessment for Aquatic Management Activities



* In the above risk assessment example, tasks identified as moderate, high, or severe risk should be considered to have a significant potential to move non-target species and control measures are warranted.

HACCP Spotlight Acceptable Risk



When is a risk acceptable?

The previous Risk Assessment example mentions "reducing the occurrence of a non-target (NTS) to an acceptable level." The question is "what constitutes an acceptable level?" There is no single answer to this question, but ultimately your team will need to make this determination when identifying critical control points later in Step 4. This is the risk management aspect of HACCP. Science can help you determine if your control measure will remove, for example, 90% versus 100% of a non-target, but your team must ultimately determine which of those goals is

appropriate to your situation and resource management goals.

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW) *HACCP Planning to Prevent the Spread of Invasive Species*

The example risk assessment on the previous page goes beyond an "informed judgment call" to provide a justification that explains the "yes" or "no" answer for why a non-target does or does not pose a significant risk (in Step 4, Column 3). The justification, based on the risk assessment, will be summarized in Column 4. It is simply a statement of why there is, or is not, a potential for a moving a non-target within the individual task.

It is imperative to stress that any activity will have some element of risk even if all the best procedures are applied. HACCP minimizes risks; it rarely eliminates them. A risk-free environment is an ideal situation that just does not exist in the real world. Given practical, real-world conditions, the HACCP team should focus on risks that have a reasonable likelihood of occurring and must decide what is reasonable and what is not. Even if the team determines there is no reasonable risk, it is important to complete a HACCP plan to document how you came to this decision. In addition, if and when circumstances change, a HACCP plan would make re-evaluating any new risks associated with the activity much easier.

The example risk assessment separates tasks into progressive risk levels (low, moderate, high, severe) based on task attributes like drainage location, similar species assemblages, and the availability of control measures. This process begins to quantify the level of risk. By quantifying risk, a HACCP team can evaluate whether or not a task, or on a larger scale the activity, should proceed given the level of risk. A task is assigned the highest level of risk (Severe Risk) when potential non-targets cannot be effectively managed by any control measure. When a severe risk is identified, the task or activity should not occur unless the benefits of this activity clearly outweigh the potential impacts of introducing non-targets.

The risk-assessment processes used in this manual are only examples of the many risk assessment tools that may be utilized in the HACCP process. Your HACCP team should determine and use the most appropriate risk assessment process for your activity, even if it is only common sense. Any tool is acceptable if it can determine whether moving a non-target is possible. Nevertheless, it is important to document the risk assessment tool that was used (see "Supporting Documentation" in Step 5).

Once you have completed a risk assessment, any task that is identified as a significant risk ("yes" in column 3) needs control measures as described in the sections below.

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW) *HACCP Planning to Prevent the Spread of Invasive Species*

HACCP Spotlight: Risk



Wildland fire operations employ risk management tools. Photo Credit: USFWS.

Risk Assessment vs. Risk Management – What’s the Difference?

Risk assessment is part of the larger concept of risk management. The assessment phase is analytical and based on measurements or estimates of severity and probability. Risk management also includes more subjective elements including risk prioritization, risk tolerance, and associated decisions that weigh the benefits and costs of risk minimization options.

Developing Effective Control Measures

Control measures are actions that can be used to control and remove identified non-targets. Any task where the risk of moving a non-target is determined to be significant requires a control measure to reduce the non-target risk to an acceptable level.

The next two pages show how the HACCP Team completed Step 4 for the hypothetical example introduced in Chapter 4: Step 1. The HACCP team determined that potential non-targets were not significant (low risk) during the second task, but they were significant during the first, third, and fourth tasks. At this time only columns 1 – 4 will be addressed, columns 5 – 7 will be discussed in later sections.

Task #1 – “Load gear and drive to site” provides an example where a control measure is necessary as it uncertain if the equipment was properly decontaminated and stored following last use. All non-target species from each category were determined to pose a significant risk since non-target species may be able survive on equipment for extended periods of time.” Note the “Yes” for each non-target category (vertebrates, invertebrates, plants, and other organisms) in column 3 of the NTAW.

Task #2 – “Unload gear and conduct sampling” is low risk. “Risk is low for moving potential non-targets because all sampling equipment was cleaned following last use and will remain at this site” according to the justification in Column 4.

Task #3 – “Reload gear” provides another example where a control measure is necessary. The HACCP team determined that all of the non-target categories posed a significant risk since non-target species could be transferred during field activities. Note the “Yes” for each non-target category in column 3 of the NTAW.

Task #4 – “Return to warehouse and unload gear” is also a task requiring a control measure. All non-target species from each category were determined to pose a significant risk since non-target species can “Organisms could remain viable from this point until the

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW)
HACCP Planning to Prevent the Spread of Invasive Species

next survey site is reached.” Note the “Yes” for each non-target category in column 3 of the NTAW.

HACCP Step 4 – Non-Target Analysis Worksheet

1 Tasks (From Step 2)	2 Potential Non-targets (From Step 3)	3 Risk Assessment Are any non-targets significant? Yes or No	4 Justification Justify your answer in Column 3	5 Control What control measures can be applied during this task to stop the spread of non-targets?	6 CCP? Is this task a CCP? Yes or No	7 Justification Justify your answer in Column 6
Task #1 Title: Load gear and drive to site	Vertebrates Amphibians, including bullfrogs	Yes	There is risk of moving the potential non-targets from the warehouse to the next site because equipment was used at a different site during a previous survey. Organisms could remain viable from this point until this day's survey site is reached.	Verify that equipment was stored properly	Yes	This is a critical control point because this is the point where the equipment would go out into the field.
	Invertebrates NZMS	Yes			Yes	
	Plants Eurasian milfoil Purple loosestrife	Yes			Yes	
	Others Chytrid fungus Whirling disease	Yes			Yes	
Task #2 Title: Unload gear and conduct sampling	Vertebrates Amphibians, including bullfrogs	No	Risk is low for moving potential non-targets because all sampling equipment was cleaned following last use and will remain at this site.	N/A	No	There are no significant non-targets during this task.
	Invertebrates NZMS	No		N/A	No	
	Plants Eurasian milfoil Purple loosestrife	No		N/A	No	
	Others Chytrid fungus Whirling disease	No		N/A	No	

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 4 – Non-Target Analysis Worksheet

1 Tasks (From Step 2)	2 Potential Non-targets (From Step 3)	3 Risk Assessment Are any non-targets significant? Yes or No	4 Justification Justify your answer in Column 3	5 Control What control measures can be applied during this task to stop the spread of non-targets?	6 CCP? Is this task a CCP? Yes or No	7 Justification Justify your answer in Column 6
Task #3 Title: Reload gear	Vertebrates Amphibians, including bullfrogs	Yes	High risk that bullfrog eggs or adults may be in gear after sampling and could be transported	Visually inspect all gear for non-targets and remove anything found by hand Visually inspect all gear for non-targets and remove anything found by hand Visually inspect all gear for non-targets and remove anything found by hand	No	Although there is a potential to encounter NTS during this task, effective controls are not as available in the field as they are at the station. Visual inspection and hand removal are not an effective method of reducing risk of invasive species spread. The subsequent task would better serve as the CCP.
	Invertebrates NZMS	Yes	High risk that invertebrates could be in gear after sampling and could be transported			
	Plants Eurasian milfoil Purple loosestrife	Yes	High risk that plants or seeds could be attached to gear after sampling and could be transported			
	Others Chytrid fungus Whirling disease	Yes	High risk that unwanted organisms could survive on gear and could be transported			
Task #4 Title: Return to warehouse and unload gear	Vertebrates Amphibians, including bullfrogs	Yes	There is risk of moving the potential non-targets from this site to the warehouse and then to a site during subsequent field work. Organisms could remain viable from this point until the next survey site is reached	Clean and disinfect all equipment using approved disinfectant solution.	Yes	If the equipment is not decontaminated during this task, then it will not be clean for use next time it is needed.
	Invertebrates NZMS	Yes				
	Plants Eurasian milfoil Purple loosestrife	Yes				
	Others Chytrid fungus Whirling disease	Yes				

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW)
HACCP Planning to Prevent the Spread of Invasive Species

Because the risk associated with some tasks is considered significant, control measures are needed to remove the threat of a non-target. The team determined that the risk could be reduced in Task #1 any verifying that the equipment was cleaning and properly stored following its last use. Risk in Task #3 could be reduced if all gear was thoroughly inspected and all non-targets were removed by hand before proceeding to Task #4. However, hand removal, cleaning, and disinfecting would be better accomplished in Task #4 once everything was back at the warehouse. The warehouse has a decontamination station, disinfectant solution, and high pressure sprayers that are not available in the field.

The table below provides a brief list of example control measures. * For a detailed explanation and additional examples see “Suggested References for Control Measures” in Chapter 7.

Method	Example
Chemical decontamination	Soak or spray equipment for at least 1 minute with a 2% bleach solution. If invasive pathogens or diseases are suspected, a 10% solution should be used
Desiccation	Allow at least 5 days of drying time before reuse.
Freezing	Expose equipment to 14 °F for 2 hours
Manual Removal	Brush, Vacuum, Adhesive Roller
Heat Treatment	Use of steam, hot air, or hot water to bring an object’s surface temperature up to 140 °F for 30 seconds.
Water Washing	Pressure wash vehicles at minimum of 90 pounds per square inch (psi).
Dedicated Equipment	Gear only used in specific watershed or other management area
Managing Field Operations	Sampling a stream from upstream to downstream

As discussed in Step 2, if the normal operation of an activity includes procedures intended to prevent the spread of invasive species, the HACCP plan will be stronger if those procedures are listed as "control measures" rather than "tasks." Both "control measures" and "tasks" are specific procedures required to complete an activity. However, control measures are additional procedures necessary to eliminate or reduce the likelihood of moving non-target species should a task present a significant risk. These measures require the HACCP plan to provide valuable documentation, monitoring, and evaluation of the procedure and prescribed corrective actions should the control measures fail. Tasks do not have this requirement and should be limited to only

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW) *HACCP Planning to Prevent the Spread of Invasive Species*

procedures necessary to complete or advance the management objective. In other words, tasks can stand alone while control measures always correspond to a specific task and are required to mitigate risks encountered while completing a related task. An effective HACCP plan will reflect this distinction.

Developing effective control measures relies on assembling a HACCP team with the expertise to understand the overall conditions and potential non-target risks associated with the proposed activity. The risk assessment process will guide teams to define the possible significance and severity of risks associated with an activity. It is an important responsibility of the HACCP team to expand and enlist all available knowledge in Step 4 to further evaluate these risks and develop appropriate control measures that reduce non-target risks to an acceptable level.



Filtering “sock” on pond water supply line. Photo Credit: Bob Pitman & Robert Lindsey, USFWS

Keep in mind that there may be differences of opinion, even among experts, as to 1) the type of control measure that will be effective at reducing the non-target risk, or 2) whether control measures are warranted given the severity of the non-target risk. Although risk assessments set the initial level of risk, the HACCP team must weigh all opinions for each risk to determine an effective control measure. It is important to include brainstorming if there are differing views or if conditions surrounding the activity are not clear. In many cases, uniform protocols for managing particular invasive species do not exist. This may be due to lack of research, inconsistent results from

existing research studies, or methods that are highly variable based on the environment and materials involved. Having the right level of expertise on the HACCP planning team and making use of available reference materials will better inform decisions on appropriate control measures. The constant evolution of invasive species management is yet another reason to think of a HACCP plan as a “living document.”

HACCP planning may become difficult if the team identifies too many specific non-targets. This dilutes your ability to focus efforts and control the truly significant risks. Accordingly, it is essential that only significant non-target species be controlled with the HACCP plan. The difficulty is deciding what is “significant.” As a general guideline, a non-target must be controlled if 1) it is reasonably likely to occur beyond an acceptable level, **and** 2) if not properly controlled, the non-target is likely to result in harm to the resource.

If control measures cannot be applied to reduce risk, then the HACCP team should re-evaluate the management objective, the activity, and individual tasks to determine any modifications can be made to reduce the non-target risk an acceptable level. This can be accomplished by adjusting the activity to remove the issue or gather additional expertise to identify control measures not yet considered. After further assessment, if the activity or

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW) *HACCP Planning to Prevent the Spread of Invasive Species*

task still cannot be adjusted to reduce risk to an acceptable level, then the team must determine if the activity is worth the risk, considering the potential impacts that could manifest should an unwanted introduction occur. In general, it is recommended that activity with such severe risks should be discontinued under the prescribed management objective until effective control measures can be implemented to a degree that reduces risk to an acceptable level. Notable exceptions might include emergency operations, activities performed for national security, and/or situations where the ecological benefits clearly outweigh the risks associated with potential invasive species.

Determining Critical Control Points

For each control point, a decision must be made on whether or not the task and its associated control measure(s) should be considered a **critical control point (CCP)** for the overall activity (recorded as "yes" or "no" in column 6, with justification in column 7). If any potential non-targets have been identified in Step 3, then you must identify at least one task as a critical control point within your HACCP plan. Later, in Step 5, you will specify the controlled conditions under which all tasks identified as CCPs are completed.

Key Definitions:

Control Point - any step or task during which potential hazards can be controlled. Control points may be critical control points or optional control points. Only critical control points are essential for preventing risk, however, if resources allow, optional control points may also be employed to further minimize risk well below acceptable levels.

Critical Control Point (CCP) - the best point, step, or procedure at which significant hazards (non-targets) can be controlled, prevented, or reduced to acceptable levels in order to minimize the risk of spread.

Optional Control Point - a task during which control measures could be applied to prevent or reduce the risk of significant non-target hazards, but control at this point, although potentially helpful, is not essential for removing or reducing the significant non-target hazard (usually because control measures are more effective if applied during another task).

Each tasks identified as having a significant risk of moving a non-target, must be associated with a control measure to address the non-target risk. The point during a task when a control measure is implemented is known as a control point. In the hypothetical example (Chapter 4: Page 16), Tasks # 1, 3, and are control points. Using Task #4, "Return to warehouse and unload gear", as an example, he associated control measure is "Clean and disinfect all equipment using approved disinfectant solution."

Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW) *HACCP Planning to Prevent the Spread of Invasive Species*

How can you determine if a control point is critical or not?

Control points are categorized as either optional or critical. Optional control points may not be the best point to remove a significant non-target risk, but still may be an important ancillary strategy for reducing non-targets within the activity. The control measures implemented at an optional control point help in reducing the risk of these non-target species impacting a later task. **Implementing** control measures at optional control points often makes sense when there is little cost or effort, but much to gain in terms of reduced risk.

Critical Control Points (CCPs) are crucial in reducing the non-target risk to an acceptable level to complete a successful activity under the management objective. Points may be identified as CCPs where the risk of non-target hazards can be prevented **once-and-for-all**.

Designated CCPs should be limited only to those tasks where control of the significant non-target risks can be best achieved.

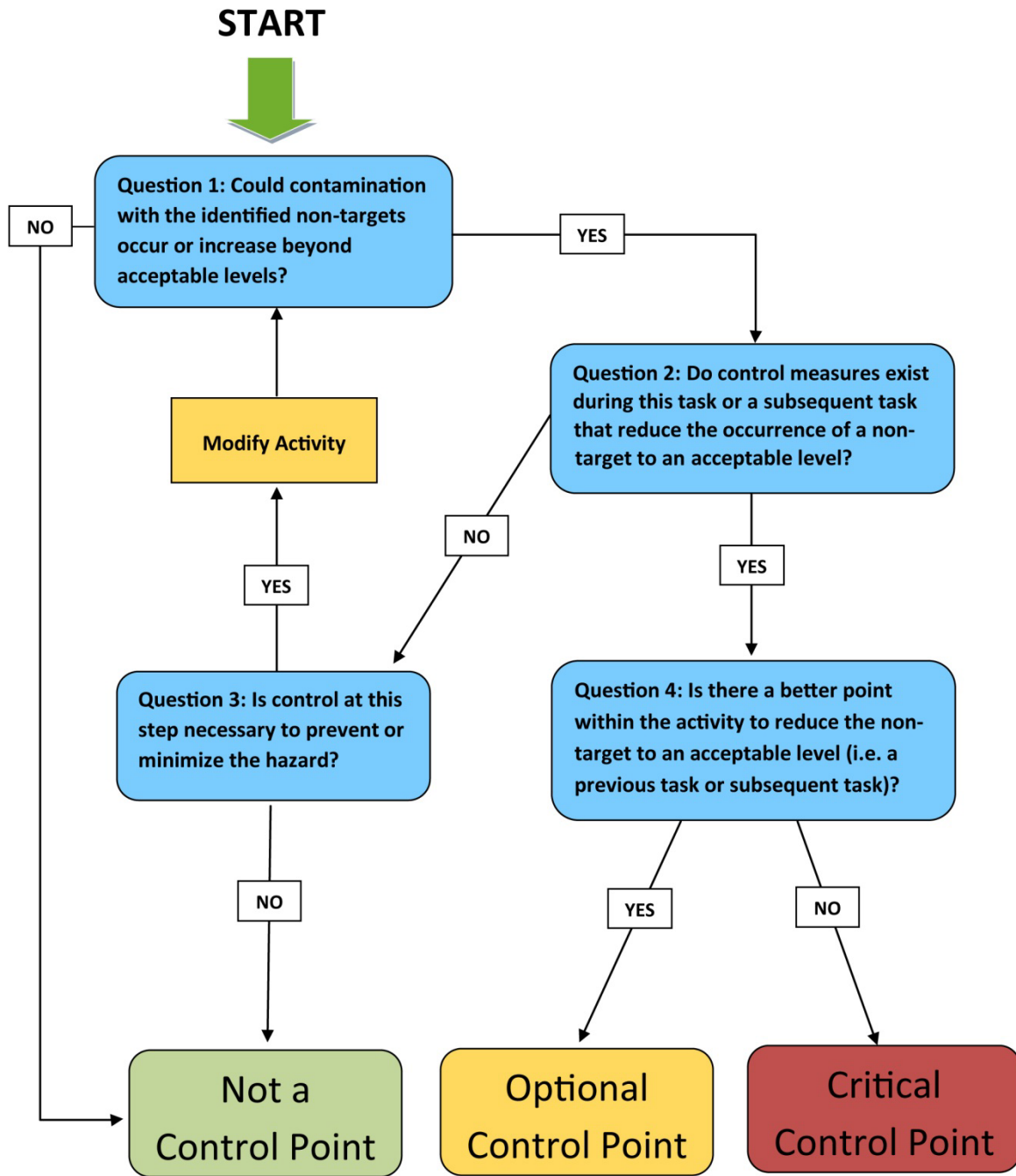
Differentiating between CCPs and optional control points varies from activity to activity and depends on the uniqueness of the activity. When designating CCPs, you must also consider any applicable statutes or rules. For example, if it is illegal to transport a particular non-target species over land in a given state, preventing contamination at a prior step becomes a CCP, even if from a biological standpoint, the CCP makes more sense at the receiving water.

During the non-target risk analysis in the previous section, you learned how to determine where non-targets enter an activity. Often, the best place to control a non-target is at the point of entry. But this is not always true. The CCP can be several tasks away from the point at which the significant non-target risk is introduced.

A series of questions can help you identify CCPs for an activity. The questions are shown in the form of a CCP Decision Tree. You should complete the Decision Tree for each control point, independently evaluating each task and non-target category that were identified as having risk. For example, if you identified two control points in the activity and all four non-targets categories pose a significant risk, then you would need to run through the Decision Tree a total of eight times ($2 \times 4 = 8$) in order to cover each unique non-target/task combination. Properly used, the CCP Decision Tree can be a helpful tool in identifying CCPs, but it is not perfect. Use your best judgment.

Once each control point is evaluated, any task identified as a CCP needs to be carried on to Step 5, the Non-Target Risk Action Plan Form. This step will develop a plan for addressing the significant non-targets. In the event that no critical control points are identified for the entire activity, the HACCP team needs to reconsider their analysis and/or consider whether one or more tasks in the activity need to be modified.

Critical Control Point Decision Tree



Chapter 4: HACCP Planning: Step 4 – Non-Target Analysis Worksheet (NTAW) *HACCP Planning to Prevent the Spread of Invasive Species*

HACCP Spotlight: Too Many CCP's



Is this an optional or critical control point. Photo Credit: Paul Nelson, USGS.

A HACCP plan can lose focus if control points are unnecessarily identified as CCPs.

If control measures are not applied, then that task does not have a control point. This means the task is neither an optional control point nor a critical control point (CCP). Only points where control measures are implemented are control points. Moreover, only points at which significant risks **must** be controlled are considered critical control points. Those new to the HACCP planning process tend to designate many optional control points as CCPs. This may unnecessarily increase effort and reduce efficiency. Although it may make sense to have multiple CCPs to address multiple targets that have unique control needs, HACCP planning teams should look carefully at multiple CCPs that cover the same target species...this likely indicates unnecessary redundancy.

Step 5 – Non-Target Risk Action Plan (NTRAP)

Learning Objectives:

At the end of Step 5, the participants will be able to:

- Explain how Steps 1, 2, 3 and 4 of the HACCP Planning process apply to the Non-Target Risk Action Plan (NTRAP).
- Define the prescribed limit, range, or criterion for control measures.
- Describe the process for monitoring and evaluating control measures and establish corrective actions if needed.
- Describe the importance and use of supporting documentation.
- Complete a Step 5 NTRAP form.

In order to complete the final form in your HACCP plan, you will need information completed in Step 4 (the Non-Target Analysis Worksheet). Find the tasks that you have identified as Critical Control Points (CCPs) in column 6 of the Non-Target Analysis Worksheet. A HACCP plan must have at least one CCP to be effective and reduce the risk posed by non-targets. You will complete a separate form for each CCP identified from your Non-Target Analysis Worksheet. Each CCP should be addressed by the Non-Target Risk Action Plan (NTRAP).

The NTRAP form below provides a template for Step 5. The sections following discuss the information needed to complete each box of the NTRAP form.

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 5 – Non-Target Risk Action Plan (NTRAP)
 Yes"Use this form for any "Yes" from Column 6 of HACCP Step 4 - Non-Target Analysis Worksheet)
 One page for each Critical Control Point

Management Objective From Step 1	
Critical Control Point: Task #	
Title:	
Significant Non-Target(s) (Step 4, Column 3)	
Control Measure(s) (Step 4, Column 5)	
Prescribed ranges, limits, or criteria for control measure(s): (PRLC)	
Monitoring the Control Measure(s)	Who?
	How?
	Where?
	How often?
Corrective Action(s) if Control Measures Fail (or PRLC cannot be met)	
Supporting Documents (For example, Management Plan, Checklist, Decontamination Techniques, SOPs, Scientific Journal Articles, etc.)	
Development Team Members	
Date Developed:	
Date(s) Reviewed:	

** all gray fields are required*

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP)

HACCP Planning to Prevent the Spread of Invasive Species

Management Objective

Review the Activity Description (HACCP Step 1) and copy the management objective into the first box of the NTRAP (HACCP Step 5). This information is included to remind those using the form of the overall reason for the management activity.

Critical Control Point Task

Review your Non-Target Analysis Worksheet (HACCP Step 4) and find the first CCP (see column 6). Copy the title of the task that corresponds to this CCP into the appropriate box on the NTRAP. Also, add the task number in the adjacent box.

Significant Non-Targets

The same NTRAP form can be used for multiple non-targets as long as they use the same control measure. If different control measures are required for different non-targets then an NTRAP form is necessary for each unique control measure/non-target combination. Review your Non-Target Analysis Worksheet (HACCP Step 4) and find the non-target risks that you identified as significant (See Step 4 column 3). Each significant non-target must be copied into this box on the NTRAP.

Control Measures

For each significant non-target risk, a control measure should be identified and listed on the Non-Target Analysis Worksheet (Step 4). Copy the control measures that correspond to each significant risk into this box on the NTRAP.

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP)
HACCP Planning to Prevent the Spread of Invasive Species

Pages 45-46 show how the HACCP team completed Step 5 for the hypothetical example introduced in Chapter 4: Step 1 (page 16).

HACCP Step 5 – Non-Target Risk Action Plan (NTRAP)

(Use this form for any "Yes" from Column 6 of HACCP Step 4 - Non-Target Analysis Worksheet)
 One page for each Critical Control Point

Management Objective From Step 1	Habitat Survey for the Recovery of Cutthroat Trout (CT)
Critical Control Point Task #	1
Title:	Load gear and drive to site
Significant Non-Target(s) (Step 4, Column 3)	Vertebrates, Invertebrates, Plants, and Other Organisms (All listed in step 3)
Control Measure(s) (Step 4, Column 5)	Verify that equipment was stored properly
Prescribed ranges, limits, or criteria for control measure(s): (PRLC)	Verify that control measure checklist was signed following last use.
Monitoring the Control Measure(s)	Who? Field crew
	How? Verify the date and signature, verify that the equipment is in its proper storage location
	Where? At the warehouse
	How often? Prior to loading the equipment
Corrective Action(s) if Control Measures Fail (or PRLC cannot be met)	Repeat the control measures from task 4: Remove all visible dirt material organisms. Rinse undercarriage of vehicles with high-pressure water spray. Use disinfectant solution that contains quaternary ammonium mixed at a concentration of at least 1% but no more than 3%. Contact time with gear must be at least 10 minutes Verification sheet must be signed to show that the control measure was executed
Supporting Documents <i>For example, Management Plan, Checklist, Decontamination Techniques, SOPs, Scientific Journal Articles, etc.)</i>	Thompson Basin Sampling Protocol, Quaternary Ammonium Disinfectant Information Sheet, Nevada Noxious Weed List, California Noxious Weed List, Verification sheet/checklist, and Diagram of Activity
Development Team Members	Jonathan Thompson, David Britton, Susan Pasko
Date Developed:	9/13/2012
Date(s) Reviewed:	9/13/2013

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 5 – Non-Target Risk Action Plan (NTRAP) (Use this form for any
 "Yes" from Column 6 of HACCP Step 4 - Non-Target Analysis Worksheet)
 One page for each Critical Control Point

Management Objective From Step 1	Habitat Survey for the Recovery of Cutthroat Trout (CT)	
Critical Control Point: Task #	4	
Title:	Return to warehouse and unload gear	
Significant Non-Target(s) (Step 4, Column 3)	Vertebrates, Invertebrates, Plants, and Other Organisms (All listed in step 3)	
Control Measure(s) (Step 4, Column 5)	Clean, disinfect all equipment using approved disinfectant solution	
Precribed ranges, limits, or criteria for control measure(s): (PRLC)	Remove all visible dirt material organisms. Vehicles: Rinse vehicles with high-pressure water spray, at a minimum 90 psi, paying particular attention to undercarriage and tire treads Gear: Submerge in disinfectant solution that contains quaternary ammonium mixed at a concentration of at least 1% but no more than 3%. Contact time with gear must be at least 10 minutes. Verification sheet must be signed to show that the control measure was executed.	
Monitoring the Control Measure(s)	Who?	Hatchery staff
	How?	Vehicles: Use gauge on power washer to ensure minimum of 90 psi is maintained throughout cleaning. Gear Check immersion time with timer. Ensure concentration is correct with AQA1507 Quaternary Ammonium Test Kit (or similar)
	Where?	Decontamination station at the warehouse
	How often?	Every time that gear is unloaded and stored
Corrective Action(s) if Control Measures Fail (or PRLC cannot be met)	Vehicles: Re-rinse with power wash spray until non-target organisms are no longer detected. Gear: Mix new (fresh) dosage of disinfectant solution and repeat the cleaning/disinfectant procedure from the beginning. If gear cannot be disinfected, it must be clearly tagged as "contaminated" and isolated until it can be disinfected before being allowed back in the field.	
Supporting Documents (For example, Management Plan, Checklist, Decontamination Techniques, SOPs, Scientific Journal Articles, etc.)	Logan River Sampling Protocol, Louanne River Sampling Protocol, Quaternary Ammonium Disinfectant Information Sheet, Nevada Noxious Weed List, California Noxious Weed List	
Development Team Members	Jonathan Thompson, Ronald Smith, Louanne McMartin	
Date Developed:	9/13/2012	
Date(s) Reviewed:	9/13/2013	

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP) *HACCP Planning to Prevent the Spread of Invasive Species*

Prescribed Ranges, Limits, or Criteria for Control Measure

There should be boundaries or criteria that must be met for your control measure to be effective. In HACCP planning, these are referred to as **Prescribed Ranges, Limits, or Criteria (PRLC)**. Prescribed Ranges, Limits, or Criteria (previous versions of HACCP refer to this as a “control limit”) are specific measurable attributes that can be used to determine if control measures are effectively minimizing risk (e.g., a minimum dose of a disinfectant, a minimum exposure time, or an acceptable range of temperatures).

If possible, allow for a margin of error around your absolute minimum and/or maximum threshold. Routine operating limits should be more stringent than absolute control limits. This approach is analogous to safety factors that engineers incorporate into building bridges, buildings, and other structures, where a protective measure may be designed at ten times the level needed to withstand the maximum known risk factor. For example, if a certain chemical concentration, say 5 ppm, is required to control (i.e., kill) a non-target species, then a manager might set the PRLC above this minimum concentration (e.g., 10 ppm) in order to ensure the desired effect.

Alternatively, there may be a range associated with the control measure, rather than an absolute limit. For instance, a chlorine bleach solution of at least 5% may be effective in controlling New Zealand mudsnails, but 10% may damage equipment. Therefore, your range would be at least 5% but less than 10%. The PRLC on the NTRAP for Task 4 in the hypothetical example sets a minimum disinfectant solution of 1% (the range is 1% to 3% quaternary ammonium). In this case, adhering to a minimum specific duration of contact time (10 minutes) controls the vertebrate, invertebrate, plant, and other organisms. Another PRLC is used for the power washing for vehicles, setting a minimum pressure of 90 psi.

Task 1 was identified as a CCP since it is critical to verify that the equipment was properly decontaminated and stored following the last use. If this verification is not made, then there is a risk of moving non-targets from the warehouse to the next survey site. The PRLC assigned to this circumstance is to “Verify that the control measure checklist was signed following last use.” The form below provides an example of a checklist that may be used for such situations.

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP)
HACCP Planning to Prevent the Spread of Invasive Species

Survey Equipment Inspection and Decontamination Checklist		
Item Description	Date/ID	
	First Check	Second Check
Equipment		
Nets		
Waders		
Seines		
Backpacks		
Gear Containers		
Vehicles, Boat, and Trailers		
Truck		
Trailer		
Boat		
Decontamination Equipment		
Disinfectant; ADBAC, Benzalkonium Chloride	Quaternary Ammonia Test Kit	
Buckets	Hoses	
Brushes		
Decontamination Procedure Conducted By:	Date:	
Reviewed By:	Date:	

In some cases, a limit for the appropriate control may not be readily apparent or available. For example, one commonly used control measure is visual inspection. Measurable attributes can be used to assign a PRLC to this measure include a minimum time spent or number of persons inspecting the equipment or vehicles. These measurements become the criteria by which effectiveness can be confirmed. For some control measures the information needed to define an effective PRLC may not be known. In these situations, tests may need to be conducted or information gathered from sources such as scientific publications, regulatory guidelines, experts, or experimental studies. In the end, a value should be selected that errs on the side of caution. Additionally, regular review of existing HACCP plans allows for inclusion of new PRLCs as better information becomes available.

Every control measure must have some Prescribed Range, Limit, or Criterion. Without such, there is no way to ensure effectiveness of the control measure.

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP) *HACCP Planning to Prevent the Spread of Invasive Species*

The rationale and reference materials used to establish controls and their ranges, limits, or criteria should become part of the **supporting documentation** for the HACCP plan and will help with periodic review.

Key Definitions:

Prescribed Range, Limit, or Criterion (PRLC) (previously called a “control limit”) – a specific measurable attribute that can be used to determine if control measures are effectively minimizing the risk (e.g., a minimum dose of a disinfectant, a minimum exposure time, or an acceptable range of temperatures).

Corrective Action – a procedure that must be followed if a control measure fails at a critical control point. A corrective action is backup procedure used as a second line of defense that may be necessary to prevent the spread of a non–target if the first–line defense (a control measure) fails to control a non–target.

Monitoring the Control Measure(s)

Control measure monitoring is the process that managers rely upon to maintain control at a CCP. Accurate monitoring indicates when a PRLC has or has not been met. Documented monitoring ensures that activities from the HACCP plan were followed. The following monitoring questions need to be answered in the appropriate boxes on the NTRAP.

Who monitors the control measures and the appropriate PRLC to ensure that they are implemented appropriately?

Assignment of the responsibility for monitoring is an important consideration when developing a HACCP plan. The individual assigned to CCP monitoring could be the manager, biologist, technician, or contractor. In some situations, it may be performed best by an independent party. Including all personnel in the HACCP planning process builds a broad base of understanding and commitment to the program. Any unusual occurrences or deviations from controls should be reported immediately to make sure that adjustments and corrective actions are timely. All records and documents associated with CCP monitoring should be signed or initialed by the person doing the monitoring.

How is the control measure monitored?

The purpose of monitoring is to evaluate whether the PRLC has been met. In most

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP) *HACCP Planning to Prevent the Spread of Invasive Species*

cases, monitoring must be designed to provide rapid real-time results. There is usually no time for lengthy analytical testing because control failures must be detected quickly and appropriate corrective actions instituted before the activity provides a pathway for invasion. Physical and chemical measurements are preferred monitoring methods because testing can be done rapidly. Example physical measurements include the following:

- **Time and temperature** - This combination of measurements is often used to monitor the effectiveness of procedures used to control non-target contamination of collection gear, nets, and other natural resource survey equipment and materials. An example control measure for this would be drying or freezing equipment for a specific time to kill a contaminant.
- **Water flow rate** - Since plant fragments, eggs, and many invertebrates cannot swim against the current, holding fish in flowing water to separate them from hitchhikers is one way to control the non-target. Measuring flow rate and the time required for complete water exchange is an example of physical measurements that may need to be monitored.
- **Visual examination** - Observations for the presence of non-target contamination of equipment - such as firefighting equipment, agricultural implements, sample nets, species collection gear, and boats and trailers - is one way to monitor for non-target presence. Note that when visual inspection/manual removal is an actual control measure (e.g., as a method to remove weed seeds from field clothing), visual examination would not be appropriate to also serve as a method to monitor control effectiveness. In these circumstances, monitoring should involve a means to confirm that the visual inspection was conducted properly (e.g., a crew supervisor verifying that the crew members conducted their visual inspection for an appropriate amount of time).

Where does the monitoring occur?

Control measure monitoring is best done by monitoring the potential invasion pathway (the task) rather than the specific area one intends to protect. Monitoring control measure effectiveness should not rely on simply watching to see if the non-target begins to invade the protected area. Reactive habitat monitoring often does not provide information until it is too late and containing an established invasion is difficult and costly. For this reason, the information recorded on the NTRAP should reflect where the evaluation on the PRLC will be performed. Your first priority should be to stop an invasion before it occurs. Nevertheless, monitoring for new species invasions in addition to HACCP planning is a good complementary strategy. It can help point out if there is a major failure in the HACCP plan control measures, but moreover, can sometimes facilitate initiating a response while an invasion is still manageable.

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP) *HACCP Planning to Prevent the Spread of Invasive Species*

How often are the control measures checked to ensure that they are administered appropriately?

Monitoring can be continuous or intermittent. When possible, monitor continuously. Continuous monitoring is possible for many types of physical and chemical parameters. A monitoring instrument that produces a continuous record does not control the hazard on its own; it needs to be observed periodically so that action is taken when needed. The length of time between checks directly affects the corrective action needed when a deviation from a PRLC is found. The frequency of intermittent monitoring should be determined from what you know about the activity, pathway, and life history of the non-target species.

Corrective Action

Murphy's Law states that if something can go wrong, it will. Thus, corrective actions are a necessary back-up strategy and are written in advance into the HACCP plan in order to protect our resources. A corrective action is only necessary if you have determined that a control measure failed, either through direct observation of something that has clearly gone wrong or the requirements set by the PRLC were not met. When control measures are not implemented correctly at a CCP, predetermined and documented corrective actions should be instituted immediately. All control measures within a HACCP plan should have a viable back-up plan because, in the real world, control measures will sometimes fail.

Effective corrective actions depend heavily on an adequate monitoring program. The primary objective is to establish a HACCP plan that permits rapid identification of deviations from a PRLC for the control measure. The sooner the deviation is identified, the more easily corrective actions can be taken and the greater the potential for minimizing the risk of spread. Specific instructions for corrective actions must be available to all workers in the operation and should be part of the documented HACCP plan. An individual who has a thorough understanding of the activity, pathway, and HACCP plan, and who has the authority to make decisions should be assigned the responsibility of implementing corrective actions. For example, if a PRLC for decontaminating field gear through freezing is not met because of a power failure, does the HACCP plan require another round of freezing later, or an alternate decontamination method now, or does it authorize the activity to continue without further decontamination? The answer depends on the nature of the risks and activity, but without including any answer, a HACCP plan is incomplete.

Corrective actions must bring the CCP back under control. A corrective action should take care of the immediate (short-term) problem as well as provide long-term solutions. The objective of the corrective action is to implement a short-term fix so that control can be re-established as soon as possible without further deviations. Any unanticipated failure of control measures necessitates a re-evaluation of the HACCP plan and the corresponding control measure(s). Reviewing the monitoring records can determine the extent of the problem and assist in identifying solutions to eliminate or minimize the initial cause for the deviation. If a control measure failure occurs, a report is helpful as

Chapter 4: HACCP Planning: Step 5 – Non-Target Risk Action Plan (NTRAP) ***HACCP Planning to Prevent the Spread of Invasive Species***

supporting documentation and should contain a description of the activity/pathway, a description of the deviation, and results of any evaluations.

Supporting Documentation

Supporting documents include information and data used to develop the plan. This includes any references used in performing the risk assessment, hazard analysis, determining the control measures used, or establishing the PRLC. Support documents may also include information about the current geographic range of potential non-targets of the activity and sufficient data used to establish the adequacy of any barriers to this contamination. In addition to data, supporting documents may also include correspondence with consultants or other experts. Documentation should also include a list of the HACCP team and, if applicable, each member's responsibilities. A section at the bottom of the Non-Target Risk Action Plan is provided for this information.

The purpose of supporting documentation is to provide objective evidence that all essential elements of the plan have a scientific basis and represent a valid approach to controlling the pathway hazards. There are several approaches to validating the HACCP plan, including incorporation of fundamental scientific principles, use of scientific data, reliance on expert opinion, or conducting of specific observations or tests.

Actual components of the plan should be validated before relying on the HACCP plan and/or when factors warrant. These factors could include changes in the pathway, using new or different control measures, release of new scientific information about potential hazards or their control, or new infestations of invasive species. Validation can be performed by the HACCP team or by an individual qualified by training or experience. Validation activities may be similar in scope and time commitment to the original plan development as they often involve a scientific or technical review of the rationale behind individual HACCP plan components such as hazard analysis or CCP verification strategies.

Multiple Critical Control Points

If you identified more than one CCP on your NTAW (Step 4), then you will need to complete an additional NTRAP form for each additional CCP that you identified. That is, you need at least one separate NTRAP form for each CCP. If an individual CCP requires different control measures for different non-target species, you will need one separate NTRAP form for each control measure/non-target species combination.

Once you have completed a NTRAP(s) for each CCP, your HACCP Plan is finished. However, do not just file it away and forget it. Please review the NTRAP every time the activity is performed and re-evaluate your HACCP plan frequently, especially if the activity is modified in any way or new hazards become known.

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Chapter 5

Implementing HACCP

Learning Objectives:

At the end of Chapter 5, participants will be able to:

- Explain the importance of HACCP plan implementation and associated options for verification.
- Explain how periodic review of HACCP plans is essential.
- Describe how sharing plans can help others as well as your own HACCP team.
- Reflect on the ultimate purpose of HACCP planning.

Supporting Documentation and Periodic Review

Like many plans, a common problem that faces the HACCP process is implementation. Many plans are constructed and then become dust collectors on a shelf. This is not the intent for a HACCP plan. Plans by themselves are only pieces of paper (or an electronic equivalent). The planning process is what is important and should not cease once a HACCP plan is completed. Circumstances change! Procedures change! Materials and personnel change! We live in a dynamic world where we need to periodically re-evaluate our actions to ensure that our precautions are still valid.

Supporting documents and periodic review are essential to the implementation of the HACCP process on the ground level. As described in Chapter 4 (Step 5), supporting documents can be checklists for verifying that work has been completed, equipment manuals, standard operating procedures, decontamination literature, or any other documents that are relevant to the activity. Peer-reviewed scientific journal articles that provide evidence for the effectiveness of a particular control measure could be important to document the validity of your established procedures. With time, new information becomes available and such information could substantially impact how your activity meets your management objectives and could impact the effectiveness of your control measures. Conducting a periodic review of the plan ensures that plan components stay fresh. During the course of a year, many projects may have employee turnover, change standard operating procedures, and/or add activities. Meanwhile, additional invasive species continually enter new habitats. A periodic review on at least an annual basis will ensure that new pathways for spreading invasive species are recognized and controlled.

It is important to consider HACCP planning as a living document for review with ever changing environmental conditions and the possibility of new non-target species influencing field activities. Considering these challenges, we recommend that you and your partners make a reasonable effort to review standard operating procedures and

Chapter 5 – Implementing HACCP ***HACCP Planning to Prevent the Spread of Invasive Species***

HACCP documents on a consistent and timely basis. Do not rely on corporate memory that may retire with your most senior employees. Preserve best management practices within a fully documented HACCP plan.

One approach for ensuring implementation of HACCP plans is to use the NTRAP from Step 5 as a part of compliance documentation. For internal use, this might simply be a requirement that the responsible party sign the completed NTRAP and file it for a prescribed period of time. Where HACCP planning becomes a requirement for others (e.g., recipients of grant funds), the signed NTRAP can serve as written documentation that the plan will be or has been followed.

Sharing Plans

Sharing plans at the HACCP for Managing Natural Resource Pathways website (<https://nctc.fws.gov/courses/HACCP/index.html#home>) is a way to share your HACCP planning information. The website can be used to provide examples to other professionals that are working to prevent the spread of invasive species in their activities. Also, share your HACCP plans with partners and public entities. The more you expose those that might be affected by non-target movement and potential invasive species introductions, the better the opportunity to reduce the risk through effective communications and constructive planning. By putting your HACCP plan online, you also provide a way for others to provide valuable feedback. Interested parties or others who perform similar management activities may have ideas or suggestions that did not initially come to your HACCP team. The on-line database of HACCP plans is available to connect others around the globe and further our common goal of conserving our valuable natural resources.

HACCP and Conservation Ethics

In the end, creating and implementing a HACCP plan for natural resource activities is not really about filling out forms, protecting ourselves with the cover of supporting documents, or adding a new layer of compliance tracking. It is about doing no harm! As stewards of natural resources it is our responsibility to do our best to protect and preserve. This responsibility includes not spreading invasive species in the course of our conservation efforts. None of us wants to experience the irony of permanently damaging the resources that we work so hard to conserve. Conservation must be properly planned. A good steward will take in the larger picture and evaluate the consequences of his or her own actions (or inactions).

**“A good plan violently executed now is
better than a perfect plan next week.”**
(George Patton, American General)

Chapter 6 Glossary

AIS – Aquatic Invasive Species

Alien – an organism that is outside of its native range; an organism that is foreign to its current geographic location. See non-indigenous.

ANS – Aquatic Nuisance Species

Aquarium Release – a type of intentional introduction whereby a captive or aquatic pet animal, aquarium plant, or contaminated water is released into open waters by an aquarium hobbyist.

Aquatic Nuisance Species – a non-indigenous species that threatens the diversity or abundance of native species; the ecological stability of infested waters; or commercial, agricultural, aquaculture, or recreational activities dependent on such waters.

Aquatic Invasive Species – marine, estuarine, or freshwater organisms that, when introduced into new habitats, negatively affect aquatic ecosystems as well as human use of these natural resources. Also see invasive species.

ASTM International – formerly the American Society for Testing and Materials.

BMP – Best Management Practices.

CCP – Critical Control Point.

Control – (a) [verb] to manage the conditions of an activity or a non-target to maintain compliance with established criteria (e.g. to control a non-target means to prevent its spread). (b) [noun] the state in which correct procedures are followed and criteria are met.

Control Limit – a specific criterion that must be met for each control measure associated with a critical control point. For example, if the application of a bleach solution was used as a control measure to prevent the spread of a non-target species, the control limit might be the minimum concentration of that solution (e.g. $\geq 5\%$ bleach solution). In this example, a 3% bleach solution would fail to meet the control limit.

Control Measure – an action that can be used to control a potential hazard (sometimes referred to as a preventive measure). Control measures are the first, and sometimes only, line of defense against the spread of non-targets. If control measures fail, corrective actions should be implemented.

Chapter 6: Glossary
HACCP Planning to Prevent the Spread of Invasive Species

- Control Point** – any step or task during which potential hazards can be controlled. Control points may be critical control points or optional control points. Only critical control points are essential for preventing risk, however, if resources allow, optional control points may also be employed to further minimize risk well below acceptable levels.
- Corrective Action** – a procedure that must be followed if a control measure fails at a critical control point. A corrective action is backup procedure used as a second line of defense that may be necessary to prevent the spread of a non–target if the first–line defense (a control measure) fails to control a non–target.
- Critical Control Point (CCP)** – the best point, step, or procedure at which significant hazards (non–targets) can be controlled, prevented, or reduced to acceptable levels in order to minimize the risk of spread.
- Established** – an introduced organism with one or more reproducing, sustainable populations.
- Exotic** – something that is found outside of its native range; something that is foreign (see non-indigenous).
- HACCP** – Hazard Analysis and Critical Control Points – a system or plan for controlling hazards (non–target species) in order to minimize risk and/or detrimental impact while meeting a management objective.
- Hazard** – a non–target species that is reasonably likely to be transported through natural resource work and become established, creating negative impacts to native species and/or their habitats.
- Indigenous** – occurring or found naturally in a particular area or ecosystem (e.g. species that are indigenous to North America are those that historically occurred in North America prior to the arrival of the first European settlers). In contrast to endemic species, indigenous species may be found naturally in more than one particular geographic area. An indigenous species is a member of its native, natural community.
- Introduce** – the intentional or unintentional process of releasing, or allowing to be released, a non–target species into an ecosystem, region, or specific geographical location where it is not native
- Introduced Species** – a species moved by humans (or by human actions), either intentionally or unintentionally, to an ecosystem, region, or specific geographical location where it is not native.
- Invasive Species** – a non-indigenous organism whose introduction does or is likely to cause economic or environmental harm or harm to human health.
- Locally Established** – an introduced species with one or more naturally reproducing populations but with a very restricted distribution and no evidence of natural

Chapter 6: Glossary
HACCP Planning to Prevent the Spread of Invasive Species

range expansion (in general, limited to a relatively confined area, such as a small lake).

Lumper – a person who categorizes multiple species or tasks into few broadly defined, inclusive categories.

Monitor – conduct planned observations or measurements to assess whether a critical control point is under control and produce an accurate record for future use in verification.

Native – a species that occurs naturally within a specific geographical range (e.g. species native to North America existed there before the arrival of European settlers). See indigenous.

Naturalized – a well-established species, not originally native to a particular geographic area, but has become integrated with native species into the otherwise natural food web.

NFH – National Fish Hatchery.

NIS – Non-indigenous species.

Non-indigenous Species – an individual, group, or population of a species that is introduced by human intervention into an area or ecosystem outside of its historic, native geographic range. Synonymous with “alien,” “non-native,” “exotic,” and “introduced.”

Non-Native – see Non-indigenous Species

Non-Target – anything, including any organism, that is not intentionally moved. For example, if your management activity calls for you to stock largemouth bass, then any other species of fish (or other organism) would be a non-target. Your intent would be to only move largemouth bass.

NTAW – Non-target Analysis Worksheet. This is completed during the fourth step of the HACCP planning process.

NTRAP – Non-target Risk Action Plan. Formerly called the “HACCP Plan Worksheet,” this is the fifth and final step in the HACCP planning process.

Operating Limits – prescribed limits for control measures used to reduce the risk of contamination by non-target species. Operating limits are usually more stringent than critical limits. For example, if a certain chemical concentration, say 5 ppm, is required to control (i.e., kill) organisms of a non-target species, then a manager might set the operating limit above this minimum concentration needed to ensure effective treatment. This manager, for example, would, perhaps, set the operating limits to 8 to 10 ppm.

Chapter 6: Glossary
HACCP Planning to Prevent the Spread of Invasive Species

Optional Control Point – a task during which control measures could be applied to prevent or reduce the risk of significant non–target hazards, but control at this point, although potentially helpful, is not essential for removing or reducing the significant non–target hazard (usually because control measures are more effective if applied during another task).

Pathway – an activity or process through which a species may be transferred to a new location where it could become invasive (e.g., shipping, air travel).

Pathway Management – the act of assessing a pathway, identifying control points, and incorporating control measures or corrective actions to reduce or eliminate non–target species.

PPM – Parts per million.

Prescribed Range, Limit, or Criterion (PRLC) (previously called a “control limit”) – a specific measurable attribute that can be used to determine if control measures are effectively minimizing the risk (e.g., a minimum dose of a disinfectant, a minimum exposure time, or an acceptable range of temperatures).

PRLC – Prescribed Range, Limit or Criterion.

Risk – combination of the likelihood of a hazard occurring and the severity of its impacts

Severity – the level of detrimental impact of an introduced non–target species (if not properly controlled).

Splitter – A person who categorizes species or tasks into many narrowly defined, exclusive categories.

Target – anything that is intentionally moved. For example, if your management activity calls for you to stock largemouth bass, then your targets would be largemouth bass and any equipment and personnel used to carry out this activity.

USFWS – the United States Fish and Wildlife Service.

Validation – the element of verification focused on collecting and evaluating scientific and technical information to determine whether the HACCP plan, when properly implemented, effectively controls identified pathway hazards.

Vector – the specific means by which an invasive species moves within a particular pathway (e.g., a ship, agricultural products, boots).

Verification – the use of methods, procedures, or tests, in addition to those used in monitoring, that determine whether the HACCP system is in compliance with the HACCP plan and/or whether the plan needs modification.

Chapter 7 References

HACCP Websites

www.seagrant.umn.edu/ais/haccp – Minnesota Sea Grant

www.haccp-nrm.org - HACCP for Natural Resource Management (USFWS/UT Arlington)

<https://nctc.fws.gov/courses/HACCP/haccp.html> - USFWS HACCP

Invasive Species Database Examples

www.eddmaps.org - Early Detection & Distribution Mapping System - Center for Invasive Species and Ecosystem Health

www.issg.org/database/welcome - Global Invasive Species Database – IUCN

<http://www.glerl.noaa.gov/res/Programs/glansis/glansis.html> - Great Lakes Aquatic Nonindigenous Species Information System (GLANSIS)

<http://www.issg.org> - Invasive Species Specialist Group—also a list of “100 of the World’s Worst Invasive Species”

<http://invasions.si.edu/nemesis/> - National Exotic Marine and Estuarine Species Information System (NEMESIS)

<http://nas.er.usgs.gov> - Non-indigenous Aquatic Species Database – USGS

<http://plants.usda.gov/java/noxiousDriver> - USDA Plants Database

General Invasive Species Information

<http://www.anstaskforce.gov> - Aquatic Nuisance Species Task Force

<http://www.invasivespecies.gov> - National Invasive Species Council

<http://www.fws.gov/invasives> - U.S. Fish and Wildlife Service Invasive Species webpage

<https://www.usgs.gov/ecosystems/invasive-species-program>- U.S. Geological Society Invasive Species Program webpage

Chapter 7 - References
HACCP Planning to Prevent the Spread of Invasive Species

<http://www.invasivespeciesinfo.gov/index.shtml> - USDA National Invasive Species Information Center

<http://www.fs.fed.us/invasivespecies> - U.S. Forest Service Invasive Species Program webpage

<https://seagrant.sunysb.edu/articles/t/aquatic-invasive-species-home> - Sea Grant National Aquatic Nuisance Species Clearinghouse

<https://www.invasiveplantatlas.org/> — Invasive Plant Atlas of the United States

Books and Publications

ASTM E2590 - 09 Standard Guide for Conducting Hazard Analysis-Critical Control Point (HACCP) Evaluations. ASTM International, West Conshohocken, PA. 2008. DOI: 10.1520/E2590-09. www.astm.org.

Bright, C. and L. Starke. 1998. Life out of bounds: bioinvasion in a borderless world. Worldwatch Institute. W.W. Norton and Company, New York, NY. ISBN: 0393318141.

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Fuller, P.L., L.G. Nico, and J.D. Williams. 1999. Nonindigenous fishes introduced into inland waters of the United States. American Fisheries Society, Special Publication 27, Bethesda, MD.

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Minnesota Sea Grant/Michigan Sea Grant, "Hazard Analysis and Critical Control Point Analysis," MN SG-F11/MSG-00-400. University of Minnesota, Duluth, MN, 2001.

Simberloff et al. 1997. Strangers in paradise: impact and management of non

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Van Driesche, J., and R. Van Driesche. 2000. *Nature out of place: biological invasions in the global age*. Island Press. ISBN: 1559637579.

Walters, C., *Adaptive Management of Renewable Resources*, 1986, republished by The Blackburn Press, Caldwell, NJ, 2001.

Williamson, M. 1996. *Biological invasions*. Chapman and Hall. ISBN: 0412591901.

World Health Organization (WHO), "HACCP: Introducing the Hazard Analysis Critical Control Point System," Document WHO/FSF/FOS, 1997.

Videos

MN Sea Grant video. "Stop Exotics, Clean Your Boat."

MN Sea Grant video. "From Net to Sale: Controlling ANS with the HACCP Approach for Baitfish and Aquaculture Industries"

Information Television Videos:

- "Aquatic Invaders"
- "Plants Out of Place"

Suggested References for Control Measures

General Guidelines

Alien Invasive Species: A Toolkit of Best Prevention and Management Practices

Wittenberg, R., Cock, M.J.W. (eds.) 2001. *Invasive Alien Species: A Toolkit of Best Prevention and Management Practices*. CAB International, Wallingford, Oxon, UK, xvii - 228.

Available online at:

http://www.issg.org/pdf/publications/GISP/Guidelines_Toolkits_BestPractice/Wittenberg&Cock_2001_EN.pdf

This document includes an introductory material, methods for prevention of invasive species, risk-analysis, and early detection.

Assessing and Managing Invasive Species within Protected Areas

Tu, M. 2009. *Assessing and Managing Invasive Species within Protected Areas*. Protected Area Quick Guide Series. Editor, J. Ervin. Arlington, VA. The Nature Conservancy. 40 pp.

Available online at: <http://www.cbd.int/invasive/doc/ias-tnc-guide-2009-en.pdf>

This guide provides protected area managers with guidance on how to create a comprehensive assessment and strategic plan for invasive species.

Biotic Invasions: Causes, Epidemiology, Global Consequences and Control

Ecological Society of America. 2000. *Biotic Invasions: Causes, Epidemiology, Global Consequences and Control*. Issues in Ecology 5.

Available online at: <http://www.esa.org/esa/wp-content/uploads/2013/03/issue5.pdf>

Chapter 7 - References

HACCP Planning to Prevent the Spread of Invasive Species

A scientific literature review that evaluated the impacts of invasive species as well as methods used to identify future invaders and take effective steps to prevent their dispersal and establishment.

Inspection and Cleaning Manual for Equipment and Vehicles to Prevent the Spread of Invasive Species

U.S. Department of the Interior Bureau of Reclamation. 2009. Technical Memorandum No. 86-68220-07-05. 203 pp. Available online at:

<http://www.usbr.gov/mussels/prevention/docs/EquipmentInspectionandCleaningManual2010.pdf>

This manual provides recommendations for inspection and cleaning of vehicles and equipment as a prevention tool to limit the spread of invasive species.

Transfer of Invasive Species Associated with the Movement of Military Equipment and Personnel.

Cofrancesco, Jr. AF., Reaves DR. Averett DE. July 2007. Army Corp of Engineers, Engineer Research and Development Center. ERDC/EL TR-07-8. Washington D.C., 126 pp.

Available online at: <https://apps.dtic.mil/dtic/tr/fulltext/u2/a470914.pdf>

This document provides an overview of the current process that exists to clean, inspect, and regulate the movement of invasive species through ports of embarkation and debarkation.

Decontamination for Watercraft and Aquatic Equipment

Uniform Minimum Protocols and Standards for Watercraft Inspection and Decontamination Programs for Dreissenid Mussels in the Western United States

Pacific States Marine Fisheries Commission. 2018. 54 pp.

Available online at: <https://cdn.cloud1.cemah.net/wp-content/uploads/sites/36/2016/11/UMPS-III-7-14-2016.pdf>

Maine's Safety Net - A Practical Guide to Building Wash Stations

Friends of the Cobbossee Watershed and Lakes Environmental Association. March 2006. 28 pp.

Available online at: <http://www.devilslakeor.us/text/L.%20L.%20Bean%20handbook.pdf>

This handbook has been designed to assist those organizations and citizens in building Boat Wash Stations.

Preventing Accidental Introductions of Freshwater Invasive Species

U.S. Department of Agriculture, Forest Service.

Available online at: http://www.fs.fed.us/invasivespecies/documents/Aquatic_is_prevention.pdf

This document provides standard sterilization techniques that are effective against New Zealand mudsnail, Whirling disease, and Chytrid Fungus.

Preventing Spread of Aquatic Invasive Organisms Common to the Intermountain Region

U.S. Department of Agriculture, Forest Service. Available online at:

http://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5373422.pdf

This document provides guidelines for forestry personnel to avoid the spread of aquatic invasive species.

Protect Your Waters and Stop Aquatic Hitchhikers!

Aquatic Nuisance Species Task Force. Available online at: <http://stopaquatic hitchhikers.org/> *This site provides recommendations for recreational users who want to help prevent the spread aquatic nuisance species.*

Zebra / Quagga Mussel Prevention and Control

Invasive Mussel Guidebook for Recreational Water Managers and Users: Strategies for Local Involvement.

California Resources Agency. October 2008.

Available online at: http://resources.ca.gov/docs/quagga/081105_Quagga-Zebra_Guidebook.pdf

Information presented in this guidebook deals exclusively with prevention and containment of invasive mussels.

Protect Your Boat, Fight Quagga and Zebra Mussels A Guide to Cleaning Boats

California Department of Fish and Game. October 2009.

Available online at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=4957> *This guide was compiled specifically for boat owners and watercraft users. The information contains general guidelines for all boaters and a basic checklist for inspecting and cleaning boats and recreational equipment for Quagga/Zebra mussels*

Protect Your Boat and Engine from Zebra Mussels

Wisconsin Department of Natural Resources.

Available online at: <https://dnr.wi.gov/topic/invasives/fact/pdfs/ProtectYourBoat.pdf> *This document*

describes simple and proactive steps boat owners may implement to protect their investment and prevent the spread of invasive species into more of Wisconsin's waters.

Quagga / Zebra Mussel Infestation Prevention and Response Planning Guide

National Park Service, Natural Resources Program Center, Fort Collins, Colorado. May 2007. 43 pp.

Available online at http://www.nature.nps.gov/water/quagga/QuaggaPlanningGuide_ext.pdf

This plan serves as a guiding document for park managers to provide for the prevention, early detection, and rapid response to quagga mussel infestations in western waters.

Rapid Response Plan for Zebra Mussels in the Columbia River Basin: A Comprehensive Multi-Agency Strategy to Expediently Guide Rapid Response Activities.

Heimowitz P., Phillips S. 2006. 100th Meridian Initiative. 42 pp.

Available online at: https://wdfw.wa.gov/ais/html/dreissena_polymorpha/documents/crb-dreissenid-rapid-response-plan-february-22--2014_amendednov3_2016.pdf

The goal of the plan is to serve as a roadmap to guide rapid response following the detection of zebra mussels.

Decontamination for Land Vehicles, Equipment, and Personal Gear

Guide to Preventing Aquatic Invasive Species Transport by Wildland Fire Operations

National Wildlife Coordinating Group. 2017. 66 pp.

Available online at <https://www.fs.fed.us/r6/fire/aquatic-invasive-species/National%20Fire%20Guidance.pdf>

This guide is intended to help wildland firefighters avoid the spread of aquatic invasive species through BMPs to prevent contact with and spread of invasive species, best procedures for decontaminating ground and aviation equipment.

Comparison of Relocatable Commercial Vehicle Washing Systems

Fleming J. September 2008. U.S. Department of Agriculture, Forest Service San Dimas Technology & Development Center. 0851 1809 - SDTDC. 36 pp.

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HACCP Planning to Prevent the Spread of Invasive Species

Available online at: https://www.fs.fed.us/t-d/pubs/pdf/hi_res/08511808hi.pdf

This report compares a range of vehicle washing systems with respect to efficacy, economics, waste containment, waste disposal, and the viability of any propagules that were collected in the cleaning process.

National Cooperative Highway Research Program (NCHRP) Synthesis 363: Control of Invasive Species.

The Transportation Research Board of the National Academies. 2006. Transportation Research Board, Washington D.C. 126 pp.

Available online at: http://onlinepubs.trb.org/onlinepubs/nchrp/nchrp_syn_363.pdf

The report explores the extent to which the state departments of transportation are preventing and controlling invasive species, restoring habitats, and conducting research. Successful practices and documented as well as lessons learned.

Invasive Species Best Management Practices for Transportation and Utility Rights-of-Way

Wisconsin Council on Forestry. January 2010. 63 pp.

Available online at: <https://councilonforestry.wi.gov/Documents/InvasiveSpecies/ROW-Manual.pdf> *The guidelines in this manual apply to utility and transportation corridor construction and maintenance activities.*

Wisconsin's Forestry BMPs for Invasive Species. A Field manual for Foresters, Landowners, and Loggers

Wisconsin Council on Forestry.

Available online at: <https://councilonforestry.wi.gov/Pages/InvasiveSpecies/Forestry.aspx>

This webpage provides information on prevention, control, and monitoring of priority species in forested landscapes.

Weed Prevention and Control

Guide to Noxious Weed Prevention Practices

U.S. Department of Agriculture, Forest Service. July 2001. 25 pp.

Available online at: https://www.fs.fed.us/invasivespecies/documents/FS_WeedBMP_2001.pdf

This document provides a comprehensive directory of weed prevention practices for use in Forest Service planning and wildland resource management activities and operations.

Manager's Guide to Roadside Revegetation Using Native Plants

Steinfeld DE., Riley SA., Wilkinson KM., Landis TD., Riley LE. 2007. U.S. Department of Transportation. Report # FHWA-WFL/TD-07-006. 28 pp.

Available online at:

<https://www.fs.fed.us/wildlifecrossings/library/documents/MangersGuidetoRoadsideRevegetationUsingNativePlants.pdf>

This guide summarizes an approach to effectively revegetate roadsides and other disturbance areas associated with road construction, modification, or obliteration.

Roadside Revegetation: An Integrated Approach to Establishing Native Plants

Steinfeld DE., Riley SA., Wilkinson KM., Landis TD., Riley LE. 2007. U.S. Department of Transportation. Report # FHWA-WFL/TD-07-005. 423 pp.

Available online at: http://www.nativerrevegetation.org/learn/manual_2017/

This report offers an integrated approach to facilitate the successful establishment of native plants along roadsides and other areas of disturbance associated with road modifications

Chapter 7 - References
HACCP Planning to Prevent the Spread of Invasive Species

Executive Order 13112

Federal Register: Feb 8, 1999 (Volume 64, Number 25)

By the authority vested in me as President by the Constitution and the laws of the United States of America, including the National Environmental Policy Act of 1969, as amended (42 U.S.C. 4321 et seq.), Nonindigenous Aquatic Nuisance Prevention and Control Act of 1990, as amended (16 U.S.C. 4701 et seq.), Lacey Act, as amended (18 U.S.C. 42), Federal Plant Pest Act (7 U.S.C. 150aa et seq.), Federal Noxious Weed Act of 1974, as amended (7 U.S.C. 2801 et seq.), Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.), and other pertinent statutes, to prevent the introduction of invasive species and provide for their control and to minimize the economic, ecological, and human health impacts that invasive species cause, it is ordered as follows:

- Section 1. Definitions
- Section 2. Federal Agency Duties
- Section 3. Invasive Species Council
- Section 4. Duties of the Invasive Species Council
- Section 5. Invasive Species Management Plan
- Section 6. Judicial Review and Administration

Section 1. Definitions.

- (a) "Alien species" means, with respect to a particular ecosystem, any species, including its seeds, eggs, spores, or other biological material capable of propagating that species, that is not native to that ecosystem.
- (b) "Control" means, as appropriate, eradicating, suppressing, reducing, or managing invasive species populations, preventing spread of invasive species from areas where they are present, and taking steps such as restoration of native species and habitats to reduce the effects of invasive species and to prevent further invasions.
- (c) "Ecosystem" means the complex of a community of organisms and its environment.
- (d) "Federal agency" means an executive department or agency, but does not include independent establishments as defined by 5 U.S.C. 104.
- (e) "Introduction" means the intentional or unintentional escape, release, dissemination, or placement of a species into an ecosystem as a result of human activity.
- (f) "Invasive species" means an alien species whose introduction does or is likely to cause economic or environmental harm or harm to human health.
- (g) "Native species" means, with respect to a particular ecosystem, a species that, other than as a result of an introduction, historically occurred or currently occurs in that ecosystem.

Chapter 7 - References
HACCP Planning to Prevent the Spread of Invasive Species

(h) "Species" means a group of organisms all of which have a high degree of physical and genetic similarity, generally interbreed only among themselves, and show persistent differences from members of allied groups of organisms.

(i) "Stakeholders" means, but is not limited to, State, tribal, and local government agencies, academic institutions, the scientific community, nongovernmental entities including environmental, agricultural, and conservation organizations, trade groups, commercial interests, and private landowners.

(j) "United States" means the 50 States, the District of Columbia, Puerto Rico, Guam, and all possessions, territories, and the territorial sea of the United States.

Section 2. Federal Agency Duties.

(a) Each Federal agency whose actions may affect the status of invasive species shall, to the extent practicable and permitted by law,

(1) identify such actions;

(2) subject to the availability of appropriations, and within Administration budgetary limits, use relevant programs and authorities to: (i) prevent the introduction of invasive species; (ii) detect and respond rapidly to and control populations of such species in a cost-effective and environmentally sound manner; (iii) monitor invasive species populations accurately and reliably; (iv) provide for restoration of native species and habitat conditions in ecosystems that have been invaded; (v) conduct research on invasive species and develop technologies to prevent introduction and provide for environmentally sound control of invasive species; and (vi) promote public education on invasive species and the means to address them; and

(3) not authorize, fund, or carry out actions that it believes are likely to cause or promote the introduction or spread of invasive species in the United States or elsewhere unless, pursuant to guidelines that it has prescribed, the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.

(b) Federal agencies shall pursue the duties set forth in this section in consultation with the Invasive Species Council, consistent with the Invasive Species Management Plan and in cooperation with stakeholders, as appropriate, and, as approved by the Department of State, when Federal agencies are working with international organizations and foreign nations.

Section 3. Invasive Species Council.

(a) An Invasive Species Council (Council) is hereby established whose members shall include the Secretary of State, the Secretary of the Treasury, the Secretary of Defense,

Chapter 7 - References

HACCP Planning to Prevent the Spread of Invasive Species

the Secretary of the Interior, the Secretary of Agriculture, the Secretary of Commerce, the Secretary of Transportation, and the Administrator of the Environmental Protection Agency. The Council shall be Co-Chaired by the Secretary of the Interior, the Secretary of Agriculture, and the Secretary of Commerce. The Council may invite additional Federal agency representatives to be members, including representatives from subcabinet bureaus or offices with significant responsibilities concerning invasive species, and may prescribe special procedures for their participation. The Secretary of the Interior shall, with concurrence of the Co-Chairs, appoint an Executive Director of the Council and shall provide the staff and administrative support for the Council. (b) The Secretary of the Interior shall establish an advisory committee under the Federal Advisory Committee Act, 5 U.S.C. App., to provide information and advice for consideration by the Council, and shall, after consultation with other members of the Council, appoint members of the advisory committee representing stakeholders. Among other things, the advisory committee shall recommend plans and actions at local, tribal, State, regional, and ecosystem-based levels to achieve the goals and objectives of the Management Plan in section 5 of this order. The advisory committee shall act in cooperation with stakeholders and existing organizations addressing invasive species. The Department of the Interior shall provide the administrative and financial support for the advisory committee.

Section 4. Duties of the Invasive Species Council.

The Invasive Species Council shall provide national leadership regarding invasive species, and shall:

- (a) oversee the implementation of this order and see that the Federal agency activities concerning invasive species are coordinated, complementary, cost-efficient, and effective, relying to the extent feasible and appropriate on existing organizations addressing invasive species, such as the Aquatic Nuisance Species Task Force, the Federal Interagency Committee for the Management of Noxious and Exotic Weeds, and the Committee on Environment and Natural Resources;
- (b) encourage planning and action at local, tribal, State, regional, and ecosystem-based levels to achieve the goals and objectives of the Management Plan in section 5 of this order, in cooperation with stakeholders and existing organizations addressing invasive species;
- (c) develop recommendations for international cooperation in addressing invasive species;
- (d) develop, in consultation with the Council on Environmental Quality, guidance to Federal agencies pursuant to the National Environmental Policy Act on prevention and control of invasive species, including the procurement, use, and maintenance of native species as they affect invasive species;

Chapter 7 - References

HACCP Planning to Prevent the Spread of Invasive Species

(e) facilitate development of a coordinated network among Federal agencies to document, evaluate, and monitor impacts from invasive species on the economy, the environment, and human health;

(f) facilitate establishment of a coordinated, up-to-date information-sharing system that utilizes, to the greatest extent practicable, the Internet; this system shall facilitate access to and exchange of information concerning invasive species, including, but not limited to, information on distribution and abundance of invasive species; life histories of such species and invasive characteristics; economic, environmental, and human health impacts; management techniques, and laws and programs for management, research, and public education; and

(g) prepare and issue a national Invasive Species Management Plan as set forth in section 5 of this order.

Section 5. Invasive Species Management Plan.

(a) Within 18 months after issuance of this order, the Council shall prepare and issue the first edition of a National Invasive Species Management Plan (Management Plan), which shall detail and recommend performance-oriented goals and objectives and specific measures of success for Federal agency efforts concerning invasive species. The Management Plan shall recommend specific objectives and measures for carrying out each of the Federal agency duties established in section 2(a) of this order and shall set forth steps to be taken by the Council to carry out the duties assigned to it under section 4 of this order. The Management Plan shall be developed through a public process and in consultation with Federal agencies and stakeholders.

(b) The first edition of the Management Plan shall include a review of existing and prospective approaches and authorities for preventing the introduction and spread of invasive species, including those for identifying pathways by which invasive species are introduced and for minimizing the risk of introductions via those pathways, and shall identify research needs and recommend measures to minimize the risk that introductions will occur. Such recommended measures shall provide for a science-based process to evaluate risks associated with introduction and spread of invasive species and a coordinated and systematic risk-based process to identify, monitor, and interdict pathways that may be involved in the introduction of invasive species. If recommended measures are not authorized by current law, the Council shall develop and recommend to the President through its Co-Chairs legislative proposals for necessary changes in authority.

(c) The Council shall update the Management Plan biennially and shall concurrently evaluate and report on success in achieving the goals and objectives set forth in the Management Plan. The Management Plan shall identify the personnel, other resources, and additional levels of coordination needed to achieve the Management Plan's identified goals and objectives, and the Council shall provide each edition of the Management Plan and each report on it to the Office of Management and Budget.

Chapter 7 - References
HACCP Planning to Prevent the Spread of Invasive Species

Within 18 months after measures have been recommended by the Council in any edition of the Management Plan, each Federal agency whose action is required to implement such measures shall either take the action recommended or shall provide the Council with an explanation of why the action is not feasible. The Council shall assess the effectiveness of this order no less than once each 5 years after the order is issued and shall report to the Office of Management and Budget on whether the order should be revised.

Section 6. Judicial Review and Administration.

(a) This order is intended only to improve the internal management of the executive branch and is not intended to create any right, benefit, or trust responsibility, substantive or procedural, enforceable at law or equity by a party against the United States, its agencies, its officers, or any other person.

(b) Executive Order 11987 of May 24, 1977, is hereby revoked.

(c) The requirements of this order do not affect the obligations of Federal agencies under 16 U.S.C. 4713 with respect to ballast water programs.

(d) The requirements of section 2(a)(3) of this order shall not apply to any action of the Department of State or Department of Defense if the Secretary of State or the Secretary of Defense finds that exemption from such requirements is necessary for foreign policy or national security reasons.

WILLIAM J. CLINTON
THE WHITE HOUSE,
February 3, 1999.

Executive Order 13751

Federal Register December 8, 2016 (FR Doc [2016-29519](#))

Safeguarding the Nation From the Impacts of Invasive Species

By the authority vested in me as President by the Constitution and to ensure the faithful execution of the laws of the United States of America, including the National Environmental Policy Act of 1969, as amended ([42 U.S.C. 4321 et seq.](#)), the Nonindigenous Aquatic Nuisance Prevention and Control Act of 1990, ([16 U.S.C. 4701 et seq.](#)), the Plant Protection Act ([7 U.S.C. 7701 et seq.](#)), the Lacey Act, as amended ([18 U.S.C. 42](#), [16 U.S.C. 3371-3378 et seq.](#)), the Endangered Species Act of 1973, as amended ([16 U.S.C. 1531 et seq.](#)), the Noxious Weed Control and Eradication Act of 2004 ([7 U.S.C. 7781 et seq.](#)), and other pertinent statutes, to prevent the introduction of invasive species and provide for their control, and to minimize the economic, plant, animal, ecological, and human health impacts that invasive species cause, it is hereby ordered as follows:

Section 1. Policy. It is the policy of the United States to prevent the introduction, establishment, and spread of invasive species, as well as to eradicate and control populations of invasive species that are established. Invasive species pose threats to prosperity, security, and quality of life. They have negative impacts on the environment and natural resources, agriculture and food production systems, water resources, human, animal, and plant health, infrastructure, the economy, energy, cultural resources, and military readiness. Every year, invasive species cost the United States billions of dollars in economic losses and other damages.

Of substantial growing concern are invasive species that are or may be vectors, reservoirs, and causative agents of disease, which threaten human, animal, and plant health. The introduction, establishment, and spread of invasive species create the potential for serious public health impacts, especially when considered in the context of changing climate conditions. Climate change influences the establishment, spread, and impacts of invasive species.

[Executive Order 13112](#) of February 3, 1999 (Invasive Species), called upon executive departments and agencies to take steps to prevent the introduction and spread of invasive species, and to support efforts to eradicate and control invasive species that are established. [Executive Order 13112](#) also created a coordinating body—the Invasive Species Council, also referred to as the National Invasive Species Council—to oversee implementation of the order, encourage proactive planning and action, develop recommendations for international cooperation, and take other steps to improve the Federal response to invasive species. Past efforts at preventing, eradicating, and controlling invasive species demonstrated that collaboration across Federal, State, local, tribal, and territorial government; stakeholders; and the private sector is critical to minimizing the spread of invasive species and that coordinated action is necessary to protect the assets and security of the United States.

This order amends [Executive Order 13112](#) and directs actions to continue coordinated Federal prevention and control efforts related to invasive species. This order maintains the National Invasive Species Council (Council) and the Invasive Species Advisory Committee; expands the membership of the Council; clarifies the operations of the Council; incorporates considerations of human and environmental health, climate change, technological

Chapter 7 - References

HACCP Planning to Prevent the Spread of Invasive Species

innovation, and other emerging priorities into Federal efforts to address invasive species; and strengthens coordinated, cost-efficient Federal action.

Sec. 2. Definitions. Section 1 of [Executive Order 13112](#) is amended to read as follows:

- “Section 1. Definitions.** (a) ‘Control’ means containing, suppressing, or reducing populations of invasive species.
- (b) ‘Eradication’ means the removal or destruction of an entire population of invasive species.
- (c) ‘Federal agency’ means an executive department or agency, but does not include independent establishments as defined by [5 U.S.C. 104](#).
- (d) ‘Introduction’ means, as a result of human activity, the intentional or unintentional escape, release, dissemination, or placement of an organism into an ecosystem to which it is not native.
- (e) ‘Invasive species’ means, with regard to a particular ecosystem, a non-native organism whose introduction causes or is likely to cause economic or environmental harm, or harm to human, animal, or plant health.
- (f) ‘Non-native species’ or ‘alien species’ means, with respect to a particular ecosystem, an organism, including its seeds, eggs, spores, or other biological material capable of propagating that species, that occurs outside of its natural range.
- (g) ‘Pathway’ means the mechanisms and processes by which non-native species are moved, intentionally or unintentionally, into a new ecosystem.
- (h) ‘Prevention’ means the action of stopping invasive species from being introduced or spreading into a new ecosystem.
- (i) ‘United States’ means the 50 States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, American Samoa, the U.S. Virgin Islands, the Commonwealth of the Northern Mariana Islands, all possessions, and the territorial sea of the United States as defined by Presidential Proclamation 5928 of December 27, 1988.”

Sec. 3. Federal Agency Duties. Section 2 of [Executive Order 13112](#) is amended to read as follows:

“Sec. 2. Federal Agency Duties. (a) Each Federal agency for which that agency's actions may affect the introduction, establishment, or spread of invasive species shall, to the extent practicable and permitted by law,

- (1) identify such agency actions;
- (2) subject to the availability of appropriations, and within administrative, budgetary, and jurisdictional limits, use relevant agency programs and authorities to:
 - (i) prevent the introduction, establishment, and spread of invasive species;
 - (ii) detect and respond rapidly to eradicate or control populations of invasive species in a manner that is cost-effective and minimizes human, animal, plant, and environmental health risks;
 - (iii) monitor invasive species populations accurately and reliably;
 - (iv) provide for the restoration of native species, ecosystems, and other assets that have been impacted by invasive species;
 - (v) conduct research on invasive species and develop and apply technologies to prevent their introduction, and provide for environmentally sound methods of eradication and control of invasive species;
 - (vi) promote public education and action on invasive species, their pathways, and ways to address them, with an emphasis on prevention, and early detection and rapid response;
 - (vii) assess and strengthen, as appropriate, policy and regulatory frameworks pertaining to the prevention, eradication, and control of invasive species and address regulatory gaps,

Chapter 7 - References

HACCP Planning to Prevent the Spread of Invasive Species

inconsistencies, and conflicts; (viii) coordinate with and complement similar efforts of States, territories, federally recognized American Indian tribes, Alaska Native Corporations, Native Hawaiians, local governments, nongovernmental organizations, and the private sector; and (ix) in consultation with the Department of State and with other agencies as appropriate, coordinate with foreign governments to prevent the movement and minimize the impacts of invasive species; and

(3) refrain from authorizing, funding, or implementing actions that are likely to cause or promote the introduction, establishment, or spread of invasive species in the United States unless, pursuant to guidelines that it has prescribed, the agency has determined and made public its determination that the benefits of such actions clearly outweigh the potential harm caused by invasive species; and that all feasible and prudent measures to minimize risk of harm will be taken in conjunction with the actions.

(c) Federal agencies shall pursue the duties set forth in this section in coordination, to the extent practicable, with other member agencies of the Council and staff, consistent with the National Invasive Species Council Management Plan, and in cooperation with State, local, tribal, and territorial governments, and stakeholders, as appropriate, and in consultation with the Department of State when Federal agencies are working with international organizations and foreign nations.

(d) Federal agencies that are members of the Council, and Federal interagency bodies working on issues relevant to the prevention, eradication, and control of invasive species, shall provide the Council with annual information on actions taken that implement these duties and identify barriers to advancing priority actions.

(e) To the extent practicable, Federal agencies shall also expand the use of new and existing technologies and practices; develop, share, and utilize similar metrics and standards, methodologies, and databases and, where relevant, platforms for monitoring invasive species; and, facilitate the interoperability of information systems, open data, data analytics, predictive modeling, and data reporting necessary to inform timely, science-based decision making.

Sec. 4. Emerging Priorities. Federal agencies that are members of the Council and Federal interagency bodies working on issues relevant to the prevention, eradication, and control of invasive species shall take emerging priorities into consideration, including:

(a) Federal agencies shall consider the potential public health and safety impacts of invasive species, especially those species that are vectors, reservoirs, and causative agents of disease. The Department of Health and Human Services, in coordination and consultation with relevant agencies as appropriate, shall within 1 year of this order, and as requested by the Council thereafter, provide the Office of Science and Technology Policy and the Council a report on public health impacts associated with invasive species. That report shall describe the disease, injury, immunologic, and safety impacts associated with invasive species, including any direct and indirect impacts on low-income, minority, and tribal communities.

(b) Federal agencies shall consider the impacts of climate change when working on issues relevant to the prevention, eradication, and control of invasive species, including in research and monitoring efforts, and integrate invasive species into Federal climate change coordinating frameworks and initiatives.

(c) Federal agencies shall consider opportunities to apply innovative science and technology when addressing the duties identified in section 2 of [Executive Order 13112](#), as amended,

Chapter 7 - References

HACCP Planning to Prevent the Spread of Invasive Species

including, but not limited to, promoting open data and data analytics; harnessing technological advances in remote sensing technologies, molecular tools, cloud computing, and predictive analytics; and using tools such as challenge prizes, citizen science, and crowdsourcing.

Sec. 5. National Invasive Species Council. Section 3 of [Executive Order 13112](#) is amended to read as follows:

“Sec. 3. National Invasive Species Council. (a) A National Invasive Species Council (Council) is hereby established. The mission of the Council is to provide the vision and leadership to coordinate, sustain, and expand Federal efforts to safeguard the interests of the United States through the prevention, eradication, and control of invasive species, and through the restoration of ecosystems and other assets impacted by invasive species.

(b) The Council's membership shall be composed of the following officials, who may designate a senior-level representative to perform the functions of the member:

(i) Secretary of State; (ii) Secretary of the Treasury; (iii) Secretary of Defense; (iv) Secretary of the Interior; (v) Secretary of Agriculture; (vi) Secretary of Commerce; (vii) Secretary of Health and Human Services; (viii) Secretary of Transportation; (ix) Secretary of Homeland Security; (x) Administrator of the National Aeronautics and Space Administration; (xi) Administrator of the Environmental Protection Agency; (xii) Administrator of the United States Agency for International Development; (xiii) United States Trade Representative; (xiv) Director or Chair of the following components of the Executive Office of the President: the Office of Science and Technology Policy, the Council on Environmental Quality, and the Office of Management and Budget; and (xv) Officials from such other departments, agencies, offices, or entities as the agencies set forth above, by consensus, deem appropriate.

(c) The Council shall be co-chaired by the Secretary of the Interior (Secretary), the Secretary of Agriculture, and the Secretary of Commerce, who shall meet quarterly or more frequently if needed, and who may designate a senior-level representative to perform the functions of the Co-Chair. The Council shall meet no less than once each year. The Secretary of the Interior shall, after consultation with the Co-Chairs, appoint an Executive Director of the Council to oversee a staff that supports the duties of the Council. Within 1 year of the date of this order, the Co-Chairs of the Council shall, with consensus of its members, complete a charter, which shall include any administrative policies and processes necessary to ensure the Council can satisfy the functions and responsibilities described in this order.

(d) The Secretary of the Interior shall maintain the current Invasive Species Advisory Committee established under the Federal Advisory Committee Act, 5 U.S.C. App., to provide information and advice for consideration by the Council. The Secretary shall, after consultation with other members of the Council, appoint members of the advisory committee who represent diverse stakeholders and who have expertise to advise the Council.

(e) Administration of the Council. The Department of the Interior shall provide funding and administrative support for the Council and the advisory committee consistent with existing authorities. To the extent permitted by law, including the Economy Act, and within existing appropriations, participating agencies may detail staff to the Department of the Interior to support the Council's efforts.”

Sec. 6. Duties of the National Invasive Species Council. Section 4 of [Executive Order 13112](#) is amended to read as follows:

Chapter 7 - References

HACCP Planning to Prevent the Spread of Invasive Species

“Sec. 4. Duties of the National Invasive Species Council. The Council shall provide national leadership regarding invasive species and shall:

- (a) with regard to the implementation of this order, work to ensure that the Federal agency and interagency activities concerning invasive species are coordinated, complementary, cost-efficient, and effective;
- (b) undertake a National Invasive Species Assessment in coordination with the U.S. Global Change Research Program's periodic national assessment, that evaluates the impact of invasive species on major U.S. assets, including food security, water resources, infrastructure, the environment, human, animal, and plant health, natural resources, cultural identity and resources, and military readiness, from ecological, social, and economic perspectives;
- (c) advance national incident response, data collection, and rapid reporting capacities that build on existing frameworks and programs and strengthen early detection of and rapid response to invasive species, including those that are vectors, reservoirs, or causative agents of disease;
- (d) publish an assessment by 2020 that identifies the most pressing scientific, technical, and programmatic coordination challenges to the Federal Government's capacity to prevent the introduction of invasive species, and that incorporate recommendations and priority actions to overcome these challenges into the National Invasive Species Council Management Plan, as appropriate;
- (e) support and encourage the development of new technologies and practices, and promote the use of existing technologies and practices, to prevent, eradicate, and control invasive species, including those that are vectors, reservoirs, and causative agents of disease;
- (f) convene annually to discuss and coordinate interagency priorities and report annually on activities and budget requirements for programs that contribute directly to the implementation of this order; and
- (g) publish a National Invasive Species Council Management Plan as set forth in section 5 of this order.”

Sec. 7. National Invasive Species Council Management Plan. Section 5 of [Executive Order 13112](#) is amended to read as follows:

“Sec. 5. National Invasive Species Council Management Plan. (a) By December 31, 2019, the Council shall publish a National Invasive Species Council Management Plan (Management Plan), which shall, among other priorities identified by the Council, include actions to further the implementation of the duties of the National Invasive Species Council.

(b) The Management Plan shall recommend strategies to:

- (1) provide institutional leadership and priority setting;
- (2) achieve effective interagency coordination and cost-efficiency;
- (3) raise awareness and motivate action, including through the promotion of appropriate transparency, community-level consultation, and stakeholder outreach concerning the benefits and risks to human, animal, or plant health when controlling or eradicating an invasive species;
- (4) remove institutional and policy barriers;
- (5) assess and strengthen capacities; and
- (6) foster scientific, technical, and programmatic innovation.

(c) The Council shall evaluate the effectiveness of the Management Plan implementation and update the Plan every 3 years. The Council shall provide an annual report of its achievements to the public.

Chapter 7 - References
HACCP Planning to Prevent the Spread of Invasive Species

(d) Council members may complement the Management Plan with invasive species policies and plans specific to their respective agency's roles, responsibilities, and authorities." *Start Printed Page 88614*

Sec. 8. Actions of the Department of State and Department of Defense. Section 6(d) of [Executive Order 13112](#) is amended to read as follows:

"(d) The duties of section 3(a)(2) and section 3(a)(3) of this order shall not apply to any action of the Department of State if the Secretary of State finds that exemption from such requirements is necessary for foreign policy, readiness, or national security reasons. The duties of section 3(a)(2) and section 3(a)(3) of this order shall not apply to any action of the Department of Defense if the Secretary of Defense finds that exemption from such requirements is necessary for foreign policy, readiness, or national security reasons."

Sec. 9. Obligations of the Department of Health and Human Services. A new section 6(e) of [Executive Order 13112](#) is added to read as follows:

"(e) The requirements of this order do not affect the obligations of the Department of Health and Human Services under the Public Health Service Act or the Federal Food, Drug, and Cosmetic Act."

Sec. 10. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(1) the authority granted by law to an executive department or agency, or the head thereof; or (2) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.

Barak Obama

The White House

December 5, 2016

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Appendix A – Blank HACCP Forms
HACCP Planning to Prevent the Spread of Invasive Species





Appendix A - Blank HACCP Forms

HACCP Step 1 – Activity Description

Management Objective & Contact Information
HACCP Plan Title:
Management Objective:
Contact Person:
Phone:
Email:

Activity Description i.e. Who; What; Where; When; How; Why

Appendix A – Blank HACCP Forms
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 2 – Activity Flow Chart	
Outline Sequential Tasks of Activity	
Task 1	
Title:	
Description:	
	
Task 2	
Title:	
Description:	
	
Task 3	
Title:	
Description:	
	
Task 4	
Title:	
Description:	
	
Task 5	
Title:	
Description:	

Boxes can be added or removed from the worksheet, depending on how many tasks are required by your activity. Typical HACCP plans have between four and ten tasks

Appendix A – Blank HACCP Forms
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 3 – Identify Potential Non-Targets

Non-Targets That May Potentially Be Moved/Introduced
Vertebrates:
Invertebrates:
Plants:
Other Organisms (pathogens, parasites, etc.):

Appendix A – Blank HACCP Forms
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 4 – Non-Target Analysis Worksheet

1 Tasks (From Step 2)	2 Potential Non- targets (From Step 3)	3 Risk Assessment Are any non- targets significant? Yes or No	4 Justification Justify your answer in Column 3	5 Control What control measures can be applied during this task to reduce the risk of non-targets?	6 CCP? Is this task a CCP? Yes or No	7 Justification Justify your answer in Column 6
Task # Title:	Vertebrates					
	Invertebrates					
	Plants					
	Others					
Task # Title:	Vertebrates					
	Invertebrates					
	Plants					
	Others					

Additional copies of the NTAW form may be necessary, depending on how many tasks are required by your activity. Typical HACCP plans have between four and ten tasks.

Appendix A – Blank HACCP Forms
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 5 – Non-Target Risk Action Plan (NTRAP)

(Use this form for any "Yes" from Column 6 of HACCP Step 4 - Non-Target Analysis Worksheet)
 One page for each Critical Control Point

Management Objective From Step 1	
Critical Control Point:	
Task #	
Title:	
Significant Non-Target(s) (Step 4, Column 3)	
Control Measure(s) (Step 4, Column 5)	
Prescribed ranges, limits, or criteria for control measure(s): (PRLC)	
Monitoring the Control Measure(s)	Who?
	How?
	Where?
	How often?
Corrective Action(s) if Control Measures Fail (or PRLC cannot be met)	
Supporting Documents (For example, <i>Management Plan, Checklist, Decontamination Techniques, SOPs, Scientific Journal Articles, etc.</i>)	
Development Team Members	
Date Developed:	
Date(s) Reviewed:	

*** all gray fields are required**

Additional copies of the NTRAP form may be necessary, depending on how many Critical Control Points are found in your activity. Typical HACCP plans have one or two CCPs.

Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

Appendix B - Example HACCP Forms (completed)

Hypothetical Example HACCP Plan

Throughout the year, staff members from the Cutthroat Trout National Fish Hatchery conduct monthly riparian habitat surveys to measure vegetation densities within the Thompson River Basin in Montgomery County, California. The purpose of the surveys is to gather data and information on riparian habitat to guide cutthroat trout recovery actions within the Thompson River Basin. When not in use, the specialized survey gear is stored in a warehouse on hatchery property. Surveys are begun by first retrieving all necessary gear from the warehouse at the beginning of the day. Once loaded into a pickup truck, staff members travel with the gear to the sampling site chosen for the day. After the gear is unloaded, the staff conducts the sampling activity using the appropriate gear. At the end of the day, staff members load the gear back into the truck and return to the warehouse. The gear is then unloaded and put away until needed for the next survey. Within the Thompson Basin, several potential invasive species, parasites, and diseases have been determined to be of significant concern. These include bullfrogs (*Rana catesbeiana*), New Zealand mud snails (*Potamopyrgus antipodarum*), Eurasian milfoil (*Myriophyllum spicatum*), purple loosestrife (*Lythrum salicaria*), Chytrid fungus (Phylum Chytridiomycota), and whirling disease (*Myxobolus cerebralis*).

On the following pages is a completed HACCP plan that covers the activity described above.

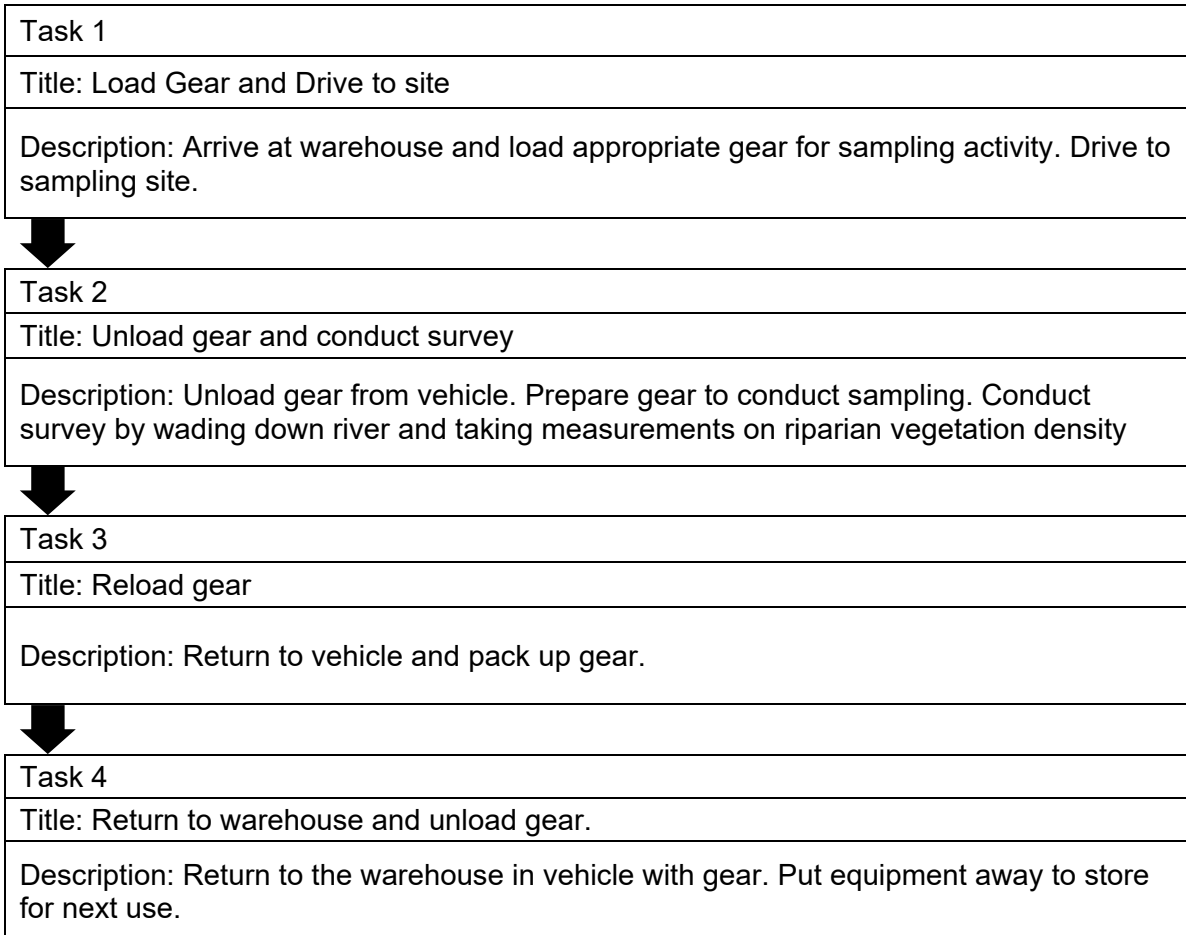
Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 1 – Activity Description

Management Objective & Contact Information
HACCP Plan Title Hypothetical HACCP Plan
Management Objective: Survey riparian vegetation habitat based on the recovery plan for the cutthroat trout (CT).
Contact Person: Dave Britton
Phone: (800) LUV-FISH
Email: David_Britton@fws.gov
Activity Description
i.e. Who; What; Where; When; How; Why
<p>Who: Cutthroat Trout National Fish Hatchery personnel</p> <p>What: Measurement of Riparian Vegetation Density</p> <p>Where: Survey sites within the Thompson River Basin. Water bodies include the Thompson River, Patterson River, Britton Creek, and Pasko Creek. There are 20 sites within the basin (5 per river or creek). Survey sites are 100 meters in length.</p> <p>When: Sites are sampled continuously throughout the year starting in April and ending in November. Only one site is sampled per day.</p> <p>How: Retrieve the appropriate gear from a warehouse at the beginning of the day. Travel to the sampling site. Once at the site the survey is conducted by wading down the river and taking measurements on riparian vegetation density. Once activity is complete, return to the warehouse. Gear is unloaded and stored.</p> <p>Why: To gather data and information on riparian habitat to help guide cutthroat trout recovery actions</p>

Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 2 – Activity Flow Chart
Outline Sequential Tasks of Activity



Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 3 – Identify Potential Non-Targets

Non-Targets That May Potentially Be Moved/Introduced
Vertebrates: Amphibians Bullfrog (<i>Rana catesbeiana</i>)
Invertebrates: New Zealand Mud snail (<i>Potamopyrgus antipodarum</i>)
Plants: Eurasian milfoil (<i>Myriophyllum spicatum</i>) Purple loosestrife (<i>Lythrum salicaria</i>)
Other Organisms (pathogens, parasites, etc.): Chytrid fungus (Phylum Chytridiomycota) Whirling disease (<i>Myxobolus cerebralis</i>)

Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 4 – Non-Target Analysis Worksheet

1 Tasks (From Step 2)	2 Potential Non-targets (From Step 3)	3 Risk Assessment Are any non-targets significant? Yes or No	4 Justification Justify your answer in Column 3	5 Control What control measures can be applied during this task to stop the spread of non-targets?	6 CCP? Is this task a CCP? Yes or No	7 Justification Justify your answer in Column 6
Task #1 Title: Load gear and drive to site	Vertebrates Amphibians, including bullfrogs	Yes	There is risk of moving the potential non-targets from the warehouse to the next site because equipment was used at a different site during a previous survey. Organisms could remain viable from this point until this day's survey site is reached.	Verify that equipment was stored properly	Yes	This is a critical control point because this is the point where the equipment would go out into the field.
Invertebrates NZMS	Yes	Yes				
Plants Eurasian milfoil Purple loosestrife	Yes	Yes				
Others Chytrid fungus Whirling disease	Yes	Yes				
Task #2 Title: Unload gear and conduct sampling	Vertebrates Amphibians, including bullfrogs	No	Risk is low for moving potential non-targets because all sampling equipment was cleaned following last use and will remain at this site.	N/A	No	There are no significant non-targets during this task.
Invertebrates NZMS	No	No				
Plants Eurasian milfoil Purple loosestrife	No	No				
Others Chytrid fungus Whirling disease	No	No				

Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 4 – Non-Target Analysis Worksheet

1 Tasks (From Step 2)	2 Potential Non-targets (From Step 3)	3 Risk Assessment Are any non-targets significant? Yes or No	4 Justification Justify your answer in Column 3	5 Control What control measures can be applied during this task to stop the spread of non-targets?	6 CCP? Is this task a CCP? Yes or No	7 Justification Justify your answer in Column 6
Task #3 Title: Reload gear	Vertebrates Amphibians, including bullfrogs	Yes	High risk that bullfrog eggs or adults may be in gear after sampling and could be transported	Visually inspect all gear for non-targets and remove anything found by hand	No	Although there is a potential to encounter NTS during this task, effective controls are not as available in the field as they are at the station. Visual inspection and hand removal are not an effective method of reducing risk of invasive species spread. The subsequent task would better serve as the CCP.
	Invertebrates NZMS	Yes	High risk that invertebrates could be in gear after sampling and could be transported		No	
	Plants Eurasian milfoil Purple loosestrife	Yes	High risk that plants or seeds could be attached to gear after sampling and could be transported		No	
	Others Chytrid fungus Whirling disease	Yes	High risk that unwanted organisms could survive on gear and could be transported		No	
Task #4 Title: Return to warehouse and unload gear	Vertebrates Amphibians, including bullfrogs	Yes	There is risk of moving the potential non-targets from this site to the warehouse and then to a site during subsequent field work. Organisms could remain viable from this point until the next survey site is reached	Clean and disinfect all equipment using approved disinfectant solution.	Yes	If the equipment is not decontaminated during this task, then it will not be clean for use next time it is needed.
	Invertebrates NZMS	Yes			Yes	
	Plants Eurasian milfoil Purple loosestrife	Yes			Yes	
	Others Chytrid fungus Whirling disease	Yes			Yes	

Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 4 – Non-Target Analysis Worksheet

1 Tasks (From Step 2)	2 Potential Non-targets (From Step 3)	3 Risk Assessment Are any non-targets significant? Yes or No	4 Justification Justify your answer in Column 3	5 Control What control measures can be applied during this task to stop the spread of non-targets?	6 CCP? Is this task a CCP? Yes or No	7 Justification Justify your answer in Column 6
Task #1 Title: Load gear and drive to site	Vertebrates Amphibians, including bullfrogs	Yes	There is risk of moving the potential non-targets from the warehouse to the next site because equipment was used at a different site during a previous survey. Organisms could remain viable from this point until this day's survey site is reached.	Verify that equipment was stored properly	Yes	This is a critical control point because this is the point where the equipment would go out into the field.
	Invertebrates NZMS	Yes			Yes	
	Plants Eurasian milfoil Purple loosestrife	Yes			Yes	
	Others Chytrid fungus Whirling disease	Yes			Yes	
Task #2 Title: Unload gear and conduct sampling	Vertebrates Amphibians, including bullfrogs	No	Risk is low for moving potential non-targets because all sampling equipment was cleaned following last use and will remain at this site.	N/A	No	There are no significant non-targets during this task.
	Invertebrates NZMS	No		N/A	No	
	Plants Eurasian milfoil Purple loosestrife	No		N/A	No	
	Others Chytrid fungus Whirling disease	No		N/A	No	

Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 4 – Non-Target Analysis Worksheet

1 Tasks (From Step 2)	2 Potential Non-targets (From Step 3)	3 Risk Assessment Are any non-targets significant? Yes or No	4 Justification Justify your answer in Column 3	5 Control What control measures can be applied during this task to stop the spread of non-targets?	6 CCP? Is this task a CCP? Yes or No	7 Justification Justify your answer in Column 6
Task #3 Title: Reload gear	Vertebrates Amphibians, including bullfrogs	Yes	High risk that bullfrog eggs or adults may be in gear after sampling and could be transported	Visually inspect all gear for non-targets and remove anything found by hand	No	Although there is a potential to encounter NTS during this task, effective controls are not as available in the field as they are at the station. Visual inspection and hand removal are not an effective method of reducing risk of invasive species spread. The subsequent task would better serve as the CCP.
	Invertebrates NZMS	Yes	High risk that invertebrates could be in gear after sampling and could be transported		No	
	Plants Eurasian milfoil Purple loosestrife	Yes	High risk that plants or seeds could be attached to gear after sampling and could be transported		No	
	Others Chytrid fungus Whirling disease	Yes	High risk that unwanted organisms could survive on gear and could be transported		No	
Task #4 Title: Return to warehouse and unload gear	Vertebrates Amphibians, including bullfrogs	Yes	There is risk of moving the potential non-targets from this site to the warehouse and then to a site during subsequent field work. Organisms could remain viable from this point until the next survey site is reached	Clean and disinfect all equipment using approved disinfectant solution.	Yes	If the equipment is not decontaminated during this task, then it will not be clean for use next time it is needed.
	Invertebrates NZMS	Yes			Yes	
	Plants Eurasian milfoil Purple loosestrife	Yes			Yes	
	Others Chytrid fungus Whirling disease	Yes			Yes	

Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 5 – Non-Target Risk Action Plan (NTRAP)

(Use this form for any "Yes" from Column 6 of HACCP Step 4 - Non-Target Analysis Worksheet)
 One page for each Critical Control Point

Management Objective From Step 1	Habitat Survey for the Recovery of Cutthroat Trout (CT)
Critical Control Point: Task #	1
Title:	Load gear and drive to site
Significant Non-Target(s) (Step 4, Column 3)	Vertebrates, Invertebrates, Plants, and Other Organisms (All listed in step 3)
Control Measure(s) (Step 4, Column 5)	Verify that equipment was stored properly
Prescribed ranges, limits, or criteria for control measure(s): (PRLC)	Verify that control measure checklist was signed following last use.
Monitoring the Control Measure(s)	Who? Field crew
	How? Verify the date and signature, verify that the equipment is in its proper storage location
	Where? At the warehouse
	How often? Prior to loading the equipment
Corrective Action(s) if Control Measures Fail (or PRLC cannot be met)	Repeat the control measures from task 4: Remove all visible dirt material organisms. Rinse undercarriage of vehicles with high-pressure water spray. Use disinfectant solution that contains quaternary ammonium mixed at a concentration of at least 1% but no more than 3%. Contact time with gear must be at least 10 minutes Verification sheet must be signed to show that the control measure was executed
Supporting Documents (For example, Management Plan, Checklist, Decontamination Techniques, SOPs, Scientific Journal Articles, etc.)	Thompson Basin Sampling Protocol, Quaternary Ammonium Disinfectant Information Sheet, Nevada Noxious Weed List, California Noxious Weed List, Verification sheet/checklist, and Diagram of Activity
Development Team Members	Jonathan Thompson, David Britton, Susan Pasko
Date Developed:	9/13/2012
Date(s) Reviewed:	9/13/2013

Appendix B – Example HACCP Forms (completed)
HACCP Planning to Prevent the Spread of Invasive Species

HACCP Step 5 – Non-Target Risk Action Plan (NTRAP)

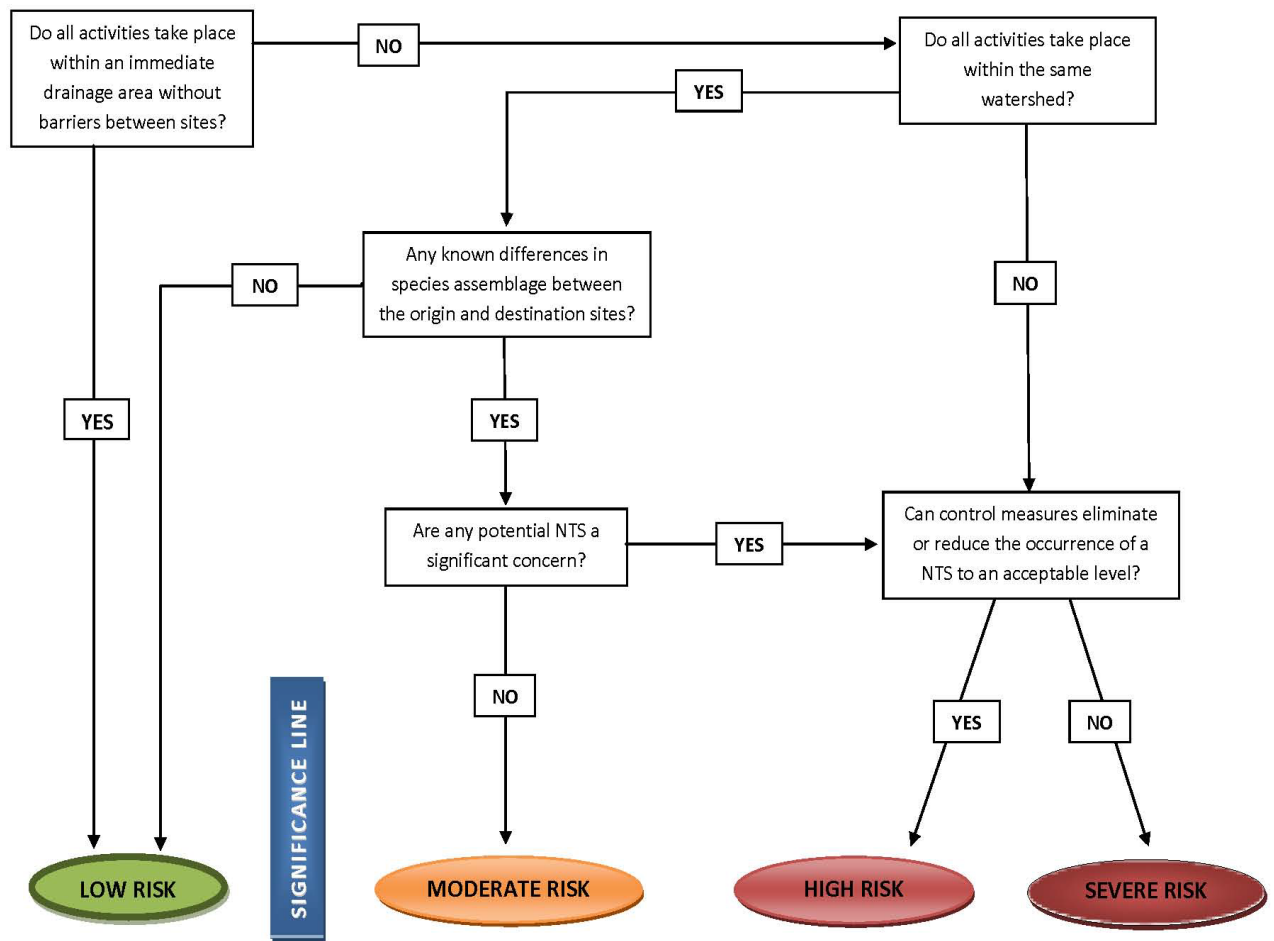
(Use this form for any "Yes" from Column 6 of HACCP Step 4 - Non-Target Analysis Worksheet)
 One page for each Critical Control Point

Management Objective From Step 1	Habitat Survey for the Recovery of Cutthroat Trout (CT)
Critical Control Point: Task #	4
Title:	Return to warehouse and unload gear
Significant Non-Target(s) (Step 4, Column 3)	Vertebrates, Invertebrates, Plants, and Other Organisms (All listed in step 3)
Control Measure(s) (Step 4, Column 5)	Clean and disinfect all equipment using approved disinfectant solution
Prescribed ranges, limits, or criteria for control measure(s): (PRLC)	Remove all visible dirt material organisms. Vehicles: Rinse vehicles with high-pressure water spray, at a minimum 90 psi, paying particular attention to undercarriage and tire treads Gear: Submerge in disinfectant solution that contains quaternary ammonium mixed at a concentration of at least 1% but no more than 3%. Contact time with gear must be at least 10 minutes. Verification sheet must be signed to show control measure was executed.
Monitoring the Control Measure(s)	Who? Hatchery staff
	How? Vehicles: Use gauge on power washer to ensure minimum of 90 psi is maintained throughout cleaning. Gear Check immersion time with timer. Ensure concentration is correct with AQA1507 Quaternary Ammonium Test Kit (or similar)
	Where? Decontamination station at the warehouse
	How often? Every time that gear is unloaded and stored
Corrective Action(s) if Control Measures Fail (or PRLC cannot be met)	Vehicles: Re-rinse with power wash spray until non-target organisms are no longer detected. Gear: Mix new (fresh) dosage of disinfectant solution and repeat the cleaning/disinfectant procedure from the beginning. If gear cannot be disinfected, it must be clearly tagged as "contaminated" and isolated until it can be disinfected before being allowed back in the field.
Supporting Documents (For example, Management Plan, Checklist, Decontamination Techniques, SOPs, Scientific Journal Articles, etc.)	Logan River Sampling Protocol, Louanne River Sampling Protocol, Quaternary Ammonium Disinfectant Information Sheet, Nevada Noxious Weed List, California Noxious Weed List
Development Team Members	Jonathan Thompson, Ronald Smith, Louanne McMartin
Date Developed:	9/13/2012
Date(s) Reviewed:	9/13/2013

Appendix C – Risk Assessment Diagrams
HACCP Planning to Prevent the Spread of Invasive Species

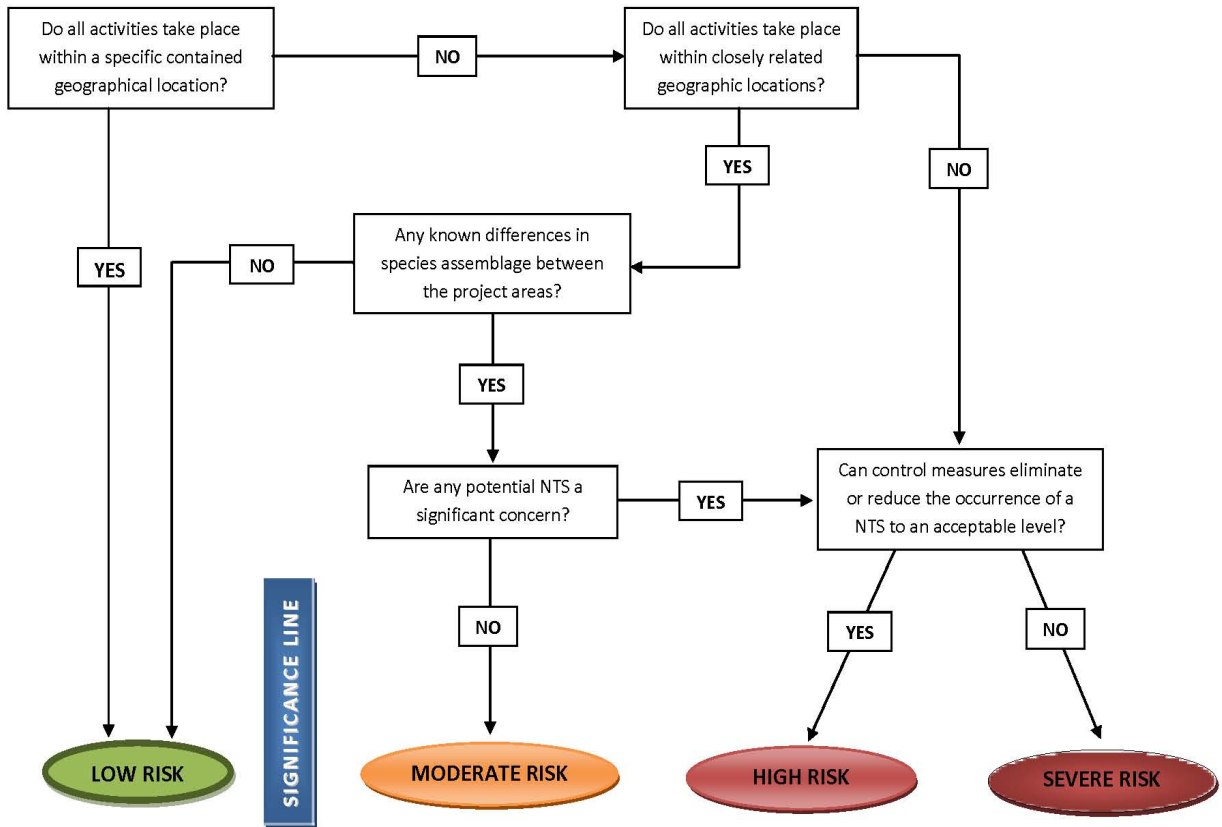
Appendix C - Risk Assessment Diagrams

HACCP Planning to Prevent Invasive Species **RISK ASSESSMENT DIAGRAM FOR AQUATIC MANAGEMENT ACTIVITIES**



Appendix C – Risk Assessment Diagrams

HACCP Planning to Prevent the Spread of Invasive Species

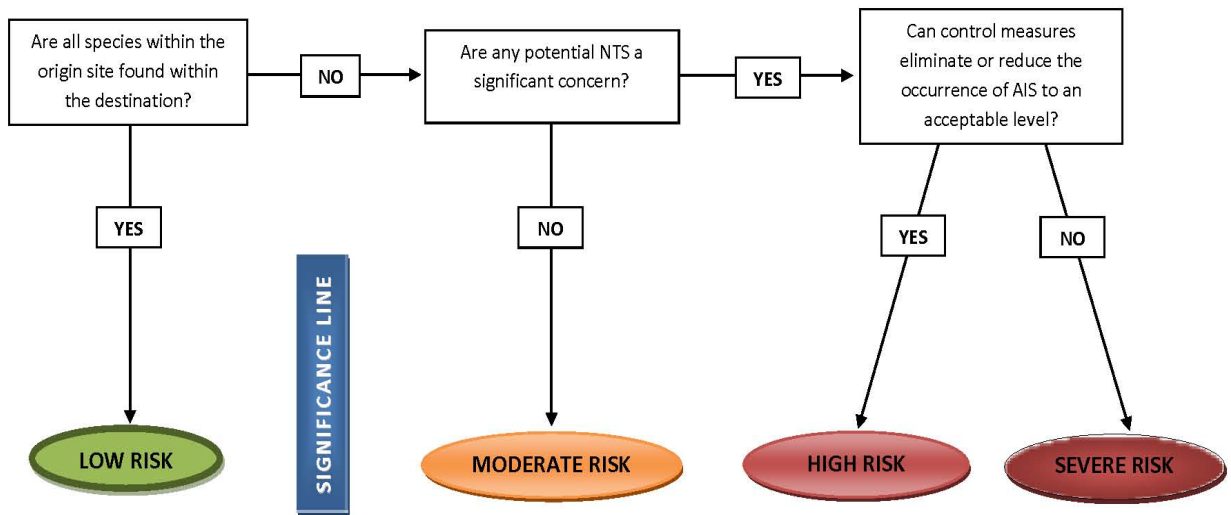


Appendix C – Risk Assessment Diagrams

HACCP Planning to Prevent the Spread of Invasive Species

HACCP Planning to Prevent Invasive Species

RISK ASSESSMENT DIAGRAM FOR THE MOVEMENT OF NATURAL RESOURCES



Appendix D – Critical Control Point Decision Tree
HACCP Planning to Prevent the Spread of Invasive Species

Appendix D – Critical Control Point Decision Tree

Critical Control Point Decision Tree

