



U.S. Department of Agriculture
Office of Inspector General



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Animal and Plant Health Inspection Service's Control Over Hawaii Pre-Departure Agriculture Inspections

Audit Report 33601-0004-41

OIG assessed the Animal and Plant Health Inspection Service's internal controls governing the inspection of passenger baggage for commercial and private aircraft departing Hawaii to the continental United States to protect against invasive plant and plant product pests and diseases.

OBJECTIVE

Our objective was to assess APHIS' internal controls governing the inspection of passenger baggage for commercial and private aircraft departing Hawaii to CONUS to protect against invasive plant and plant product pests and diseases.

REVIEWED

We assessed APHIS' internal controls over the inspection of passenger baggage departing Hawaii for CONUS. While our primary focus was on fiscal year 2023, we conducted site visits during fiscal year 2024 including observations of baggage inspections at selected airports. We conducted interviews with APHIS officials, reviewed applicable law and policies, and observed baggage inspections at selected airports to assess APHIS' internal controls.

RECOMMENDS

We recommend that APHIS (1) revise existing policy to clearly state the requirement to inspect all passenger baggage and (2) notify inspectors of the clarification to the policy.

WHAT OIG FOUND

The Animal and Plant Health Inspection Service (APHIS) has safeguards to protect the United States against the entry, establishment, and spread of economically and environmentally significant pests. APHIS prohibits or restricts the movement of many plants and plant products from Hawaii to the continental United States (CONUS) that could harbor invasive pests or diseases. APHIS inspectors inspect passenger baggage (check-in and carry-on) moving from Hawaii to CONUS. When an inspection of a passenger's baggage discloses an article in violation of the regulation, the APHIS inspector is required to seize the article.

Based on our review, APHIS inspectors did not always inspect 100 percent of passenger baggage prior to private aircraft departing Hawaii to CONUS. This occurred because APHIS' policy was unclear regarding the requirement for inspection of all aircraft passenger baggage. As a result, there was an increased risk of invasive plants and plant product pests and diseases reaching CONUS, potentially causing millions of dollars in damage, increased expenses, and lost revenue.

APHIS officials generally concurred with our finding and have initiated corrective action to address one of our recommendations. We accepted management decision for all recommendations.

We did not have any findings related to APHIS' internal controls governing the inspection of commercial aircraft passenger baggage.



OFFICE OF INSPECTOR GENERAL

United States Department of Agriculture



DATE: July 22, 2025

AUDIT

NUMBER: 33601-0004-41

TO: Dr. Michael Watson
Administrator
Animal and Plant Health Inspection Service

ATTN: Kelly Moore
Acting Deputy Administrator for Marketing and Regulatory Programs Business
Services
Animal and Plant Health Inspection Service

FROM: Yarisís Rivera-Rojas
Acting Assistant Inspector General for Audit

SUBJECT: Animal and Plant Health Inspection Service's Controls Over Hawaii
Pre-Departure Agriculture Inspections

This report presents the results of our audit of Animal and Plant Health Inspection Service's Controls Over Hawaii Pre-Departure Agriculture Inspections. Your written response to the official draft is included in its entirety at the end of the report. Based on your written response, we are accepting management decision for all two recommendations in the report, and no further response to this office is necessary.

In accordance with Departmental Regulation 1720-1, final action needs to be taken within 1 year of the date of each management decision. Please follow your internal agency procedures in forwarding final action correspondence to the Office of the Chief Financial Officer.

We appreciate the courtesies and cooperation extended to us by members of your staff during our fieldwork and subsequent discussions. This report contains publicly available information and only publicly available information will be posted to our website (<https://usdaoig.oversight.gov>) in the near future.

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Background and Objective

Background

Federal law allows the Secretary of the U.S. Department of Agriculture (USDA) to prohibit or restrict the movement in interstate commerce of any plants and plant products if the Secretary determines that the prohibition or restriction is necessary to prevent the introduction or dissemination of a plant pest or noxious weed into the United States.^{1 2} As such, USDA's Animal and Plant Health Inspection Service (APHIS) prohibits or restricts the movement of many plants and plant products from Hawaii into the continental United States (CONUS)—the 48 contiguous States, Alaska and the District of Columbia—including most fresh fruits and vegetables and certain types of plants and flowers.³



Figure 1: Educational posters displayed at a [REDACTED] agriculture carry-on inspection station, warning travelers that harmful pests can hide in fruits, vegetables, flowers, and other plants. Photo by the Office of Inspector General (OIG).

APHIS has safeguards for specific United States territories, such as Hawaii, to protect the United States' crops and forests against the entry, establishment, and spread of economically and environmentally significant pests and diseases.⁴ According to APHIS, one piece of fruit or a single plant that is carrying an invasive pest or disease could cause millions of dollars in damage and lead to increased expenses, lost revenue, and higher food prices.^{5 6} In 2024, APHIS stated it intercepted more than 280,000 prohibited agricultural items and more than 3,000 quarantine-

¹ 7 U.S.C. § 7712(a).

² A noxious weed is any plant or plant product that can directly or indirectly injure or cause damage to crops (including nursery stock or plant products), livestock, poultry, or other interests of agriculture, irrigation, navigation, the natural resources of the United States, the public health, or the environment.

³ 7 C.F.R. § 318.

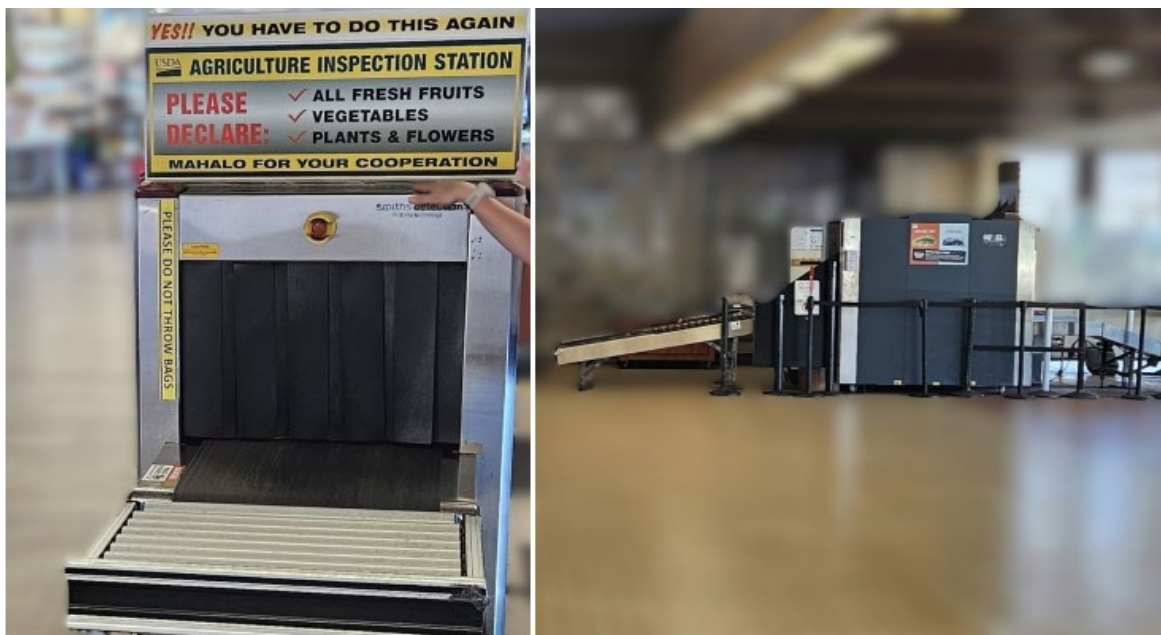
⁴ USDA APHIS, *Plant Protection and Quarantine* (July 25, 2024), <https://www.aphis.usda.gov/plant-protection-quarantine>.

⁵ An invasive pest is non-native to the ecosystem under consideration and its introduction causes or is likely to cause economic harm, environmental harm, or harm to human health.

⁶ USDA APHIS Plant Protection and Quarantine, *Baggage Inspection Required for Travelers Going From Hawaii to the U.S. Mainland, Alaska, and Guam*, Notice PPQ-20-0003 (Feb. 2020).

significant pests during baggage inspections. These inspections involved more than 16.7 million passengers bound for CONUS from Hawaii and Puerto Rico.⁷

At Hawaiian airports, APHIS inspectors inspect passenger baggage moving to CONUS prior to departure in an effort to prevent the spread of invasive pests and diseases.⁸ Commercial aircraft passengers offer their check-in and carry-on baggage for inspection at applicable agricultural inspection stations and are expected to disclose any fruits, vegetables, plants, plant products, or other articles that are requested to be disclosed by the APHIS inspector.⁹ Baggage is inspected using an x-ray conveyor system. If the APHIS inspector sees potentially prohibited items, such as fresh fruits or vegetables on the x-ray screen, the APHIS inspector conducts a manual inspection of the baggage. APHIS inspectors are required to seize any articles in violation of the regulation discovered during an inspection.¹⁰



Figures 2 and 3. Agriculture carry-on baggage inspection station prior to the boarding gate area at [REDACTED] and an agriculture inspection station used to inspect mainland-bound passengers' checked baggage at [REDACTED]. Photos by OIG.

There are similar inspection procedures for passenger baggage for private aircraft, but inspections are not done at the APHIS airport inspection stations and x-rays are not typically used. Instead, APHIS inspectors usually meet passengers near the aircraft before boarding and perform a manual inspection before passenger baggage is loaded.¹¹ APHIS inspectors are required to seize any article in violation of regulation discovered during an inspection.¹²

⁷ USDA APHIS, *2024 Impact Report*, APHIS-25-017 (Jan. 2025).

⁸ USDA APHIS Plant Protection and Quarantine, *Baggage Inspection Required for Travelers Going From Hawaii to the U.S. Mainland, Alaska, and Guam*, Notice PPQ-20-0003 (Feb. 2020).

⁹ 7 C.F.R. § 318.13-10.

¹⁰ *Ibid.*

¹¹ [REDACTED]

¹² 7 C.F.R. § 318.13-10.

Objective

Our objective was to assess APHIS' internal controls governing the inspection of passenger baggage for commercial and private aircraft departing Hawaii to the continental United States to protect against invasive plant and plant product pests and diseases.

We reviewed APHIS' internal controls governing the inspection of passenger baggage for commercial aircraft and did not have any related findings.

Finding 1: APHIS Did Not Always Inspect 100 Percent of Private Aircraft Passenger Baggage

We determined that APHIS inspectors did not always inspect 100 percent of passenger baggage prior to private aircraft departing Hawaii to CONUS. This occurred because APHIS' Hawaii-specific policy was unclear regarding the requirement for inspection of all passenger baggage.¹³ As a result, there was an increased risk of invasive plants and plant product pests and diseases entering CONUS potentially causing millions of dollars in damage, increased expenses, and lost revenue.

Federal regulations require APHIS inspectors to inspect the check-in and carry-on baggage and personal effects of passengers traveling by aircraft from Hawaii to CONUS.¹⁴ Additionally, the regulations provide APHIS inspectors with the authority to inspect and clear aircraft prior to departure.¹⁵ These regulations apply to both commercial and private aircraft.

However, APHIS' existing policy was not clear about the requirement to inspect all passenger baggage. Specifically, while there is language in the Hawaii Manual stating, "Prior to loading the aircraft, inspect baggage..." other areas appear to allow inspectors to use discretion.¹⁶ The following are examples of such language (bold emphasis added):

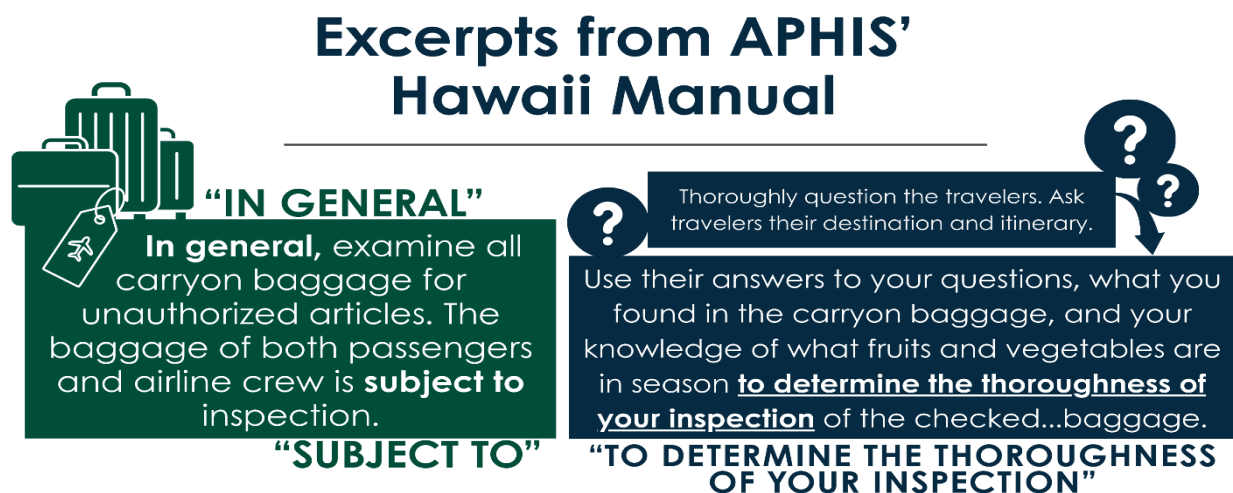


Figure 4: This figure includes excerpts from the Hawaii Manual that could be interpreted as allowing inspectors to use discretion. Figure by OIG.

¹³ USDA APHIS, *Hawaii Regulation and Clearance from Hawaii to Other Parts of the United States* (July 2023). This policy is also referred to as the Hawaii Manual.

¹⁴ 7 C.F.R. § 318.13-10(a).

¹⁵ 7 C.F.R. § 318.13-9(a).

¹⁶ USDA APHIS, *Hawaii Regulation and Clearance from Hawaii to Other Parts of the United States*, Chapter 2-1, "Inspection of Aircraft" (July 2023). The Hawaii Manual applies to both private and commercial aircraft baggage.

Consequently, we concluded that not having clear language in APHIS' Hawaii Manual requiring inspection of all passenger baggage caused misunderstandings about expectations at the State level. Based on our interviews with APHIS inspectors, we found that they [REDACTED]

[REDACTED] Some APHIS inspectors explained that the use of discretion was taught during on-the-job training. Additionally, some inspectors believed they [REDACTED]

An APHIS State of Hawaii official stated that, ideally, inspectors should inspect 100 percent of private aircraft passenger baggage; however, inspectors have discretion concerning [REDACTED] based on factors such as [REDACTED]

[REDACTED] For example, the official explained that [REDACTED]

Although the State of Hawaii official provided rationale for using discretion in certain instances, an APHIS national policy official stated that there was no policy or guidance allowing for less than 100 percent inspection of private aircraft passenger baggage. This position is supported by an APHIS travel notice published on its website which states, "To prevent the spread of invasive pests and diseases, APHIS inspects all passenger bags moving from Hawaii to the U.S. mainland, Alaska, and Guam."¹⁷

Baggage inspections are performed to reduce the likelihood that harmful pests or diseases from Hawaii will enter CONUS. Since APHIS inspectors in Hawaii did not always perform these inspections on 100 percent of private aircraft baggage, there is an increased risk that harmful pests and diseases could reach CONUS in private aircraft baggage. These pests and diseases could cause significant economic losses, requiring costly treatments to protect fruits and vegetables, and reducing the marketability of the fruit both locally and abroad. For example, as of March 2025, there were active Federal quarantines for two species of invasive fruit flies in Hawaii.

APHIS officials generally agreed with our finding and, as a result of OIG's work, initiated corrective action to address the issue of requiring inspection of all passenger baggage.

Recommendation 1

Revise existing policy to clearly state the requirement to inspect all passenger baggage.

¹⁷ USDA APHIS Plant Protection and Quarantine, *Baggage Inspection Required for Travelers Going From Hawaii to the U.S. Mainland, Alaska, and Guam*, Notice PPQ-20-0003 (Feb. 2020).

Agency Response

APHIS agrees with this recommendation. APHIS stated it has begun making final revisions to the existing manual (policy). Additionally, APHIS noted it may need to modify the requirements of inspection levels to address risk based on staffing, plant and animal health risks, and other operational constraints; accordingly. APHIS retains the right to modify inspection levels to address staffing and other operational constraints.

APHIS provided an estimated completion date of September 30, 2025.

OIG Position

We accept management decision for this recommendation.

Recommendation 2

Notify inspectors of the clarification to the policy.

Agency Response

APHIS agrees with this recommendation. APHIS stated it deployed an interim communication to inspectors on December 20, 2024. APHIS will immediately disseminate any modification in inspection level requirements to address risk based on staffing, plant and animal health risks, and other operational constraints.

APHIS provided an estimated completion date of September 30, 2025.

OIG Position

We accept management decision for this recommendation.

Scope and Methodology

The scope of our audit was APHIS' internal controls governing the inspection of passenger baggage for commercial and private aircraft departing Hawaii to CONUS to protect against invasive plant and plant product pests and diseases during fiscal year 2023. While our primary focus was on fiscal year 2023, we conducted site visits during fiscal year 2024, including observations of baggage inspections at selected airports. We performed our audit work either virtually or in-person at the APHIS national office, APHIS Hawaii State Office, [REDACTED] (see Exhibit A for additional details). We non-statistically selected two of four Hawaiian airports [REDACTED]

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Our audit fieldwork was conducted from July 2024 through May 2025. We discussed the results of our audit with agency officials on May 14, 2025, and included their comments as appropriate.

To accomplish our audit objective, we:



Reviewed the applicable law, regulations, and APHIS policy pertaining to passenger baggage inspections conducted prior to commercial and private aircraft departures from Hawaii to CONUS.



Interviewed an APHIS State of Hawaii official, as well as selected APHIS port directors and plant protection and quarantine staff at the airport level to gain an understanding of APHIS' process of conducting agriculture inspections of passenger baggage departing Hawaii on commercial and private aircraft to CONUS, as well as the internal controls governing that process.



Observed agriculture inspections of passenger baggage conducted by APHIS staff prior to departures via commercial and private aircraft to CONUS at selected airports.



Interviewed APHIS officials at the national and State levels to gain an understanding of the monitoring and risk assessment activities conducted that were related to our objective.

We reviewed the U.S. Government Accountability Office's *Standards for Internal Control in the Federal Government* to determine how we would inspect key aspects of APHIS' control environment. We assessed internal controls significant to our audit objective. Specifically, we assessed the following components and underlying principles:

18 [REDACTED]

Component	Principle
Control Activities	Management should design control activities to achieve objectives and respond to risks.
Control Activities	Management should implement control activities through policies.
Risk Assessment	Management should identify, analyze, and respond to risks related to achieving the defined objectives.
Monitoring	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.
Monitoring	Management should remediate identified internal control deficiencies on a timely basis.

We designed our audit work to assess these internal control components and underlying principles; as such, it may not have disclosed all internal control deficiencies that may have existed at the time of this audit. We did not independently review or assess the agency's information system(s); therefore, we make no representation regarding the adequacy of the agency's computer system(s), or the information generated from it.

We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our finding and conclusions based on our audit objective. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objective.

Abbreviations

APHISAnimal and Plant Health Inspection Service
CONUScontinental United States
OIGOffice of Inspector General
USDA.....U.S. Department of Agriculture

Exhibit A: Sites Visited

This exhibit shows the name and location of all the APHIS sites visited.

AUDIT SITE	LOCATION
National Office	
APHIS Headquarters	Riverdale, Maryland
State Location	
APHIS Hawaii Office	Honolulu, Oahu, Hawaii
Airports	
[REDACTED]	[REDACTED] Hawaii
[REDACTED]	[REDACTED] Hawaii

**APHIS'
Response to Audit Report**



United States
Department of
Agriculture

Marketing and
Regulatory
Programs

Washington, DC
20250

TO: Yarisís Rivera-Rojas
Acting Assistant Inspector General for Audit
Office of Inspector General

FROM: Michael T. Watson, Ph.D. /s/
Administrator
Animal and Plant Health Inspection Service

SUBJECT: APHIS Response and Request for Management Decisions on OIG
Report, APHIS' Controls Over Hawaii Pre-Departure Agriculture
Inspections (33601-0004-41)

Thank you for the opportunity for Animal and Plant Health Inspection Service (APHIS) to provide comments on this report. APHIS agrees with OIG recommendations #1 and #2 and will initiate the steps outlined below to implement the necessary program changes.

Audit Objective: OIG's objective was to assess APHIS' internal controls governing the inspection of passenger baggage for commercial and private aircraft departing Hawaii to the continental U.S. to protect against invasive plant and plant product pests and diseases.

Finding 1: APHIS Did Not Always Inspect 100 Percent of Private Aircraft Passenger Baggage

OIG determined APHIS inspectors did not always inspect 100 percent of passenger baggage prior to private aircraft departing Hawaii to the Continental U.S. (CONUS). This occurred because APHIS' Hawaii specific policy was unclear regarding the requirement for inspection of all passenger baggage. As a result, OIG found there was an increased risk of invasive plants and plant product pests and diseases entering CONUS potentially causing millions of dollars in damage, increased expenses, and lost revenue.

Recommendation 1: Clarify existing policy to clearly state the requirement to inspect all passenger baggage.

APHIS Response: APHIS agrees with this recommendation.

Corrective Actions: APHIS acknowledges the recommendation to revise existing policy to clearly state the requirement to inspect all passenger baggage. APHIS has begun making final revisions to the existing manual (policy). Additionally, APHIS may need to modify the requirements of inspection levels to address risk based on

staffing, plant and animal health risks, and other operational constraints; accordingly. APHIS retains the right to modify inspection levels to address staffing and other operational constraints.

Estimated Completion Date: September 30, 2025.

Recommendation 2: Notify inspectors of the clarification to the policy.

APHIS Response: APHIS agrees with this recommendation.

Corrective Actions: APHIS acknowledges the recommendation to notify inspectors of the clarification to the policy. APHIS deployed an interim communication to inspectors on December 20, 2024. APHIS will immediately disseminate any modification in inspection level requirements to address risk based on staffing, plant and animal health risks, and other operational constraints.

Estimated Completion Date: September 30, 2025.

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