

# **Update on Petition Process Improvement**

**BRS Stakeholder Meeting  
November 20, 2013  
T. Clint Nesbitt, Ph.D.**



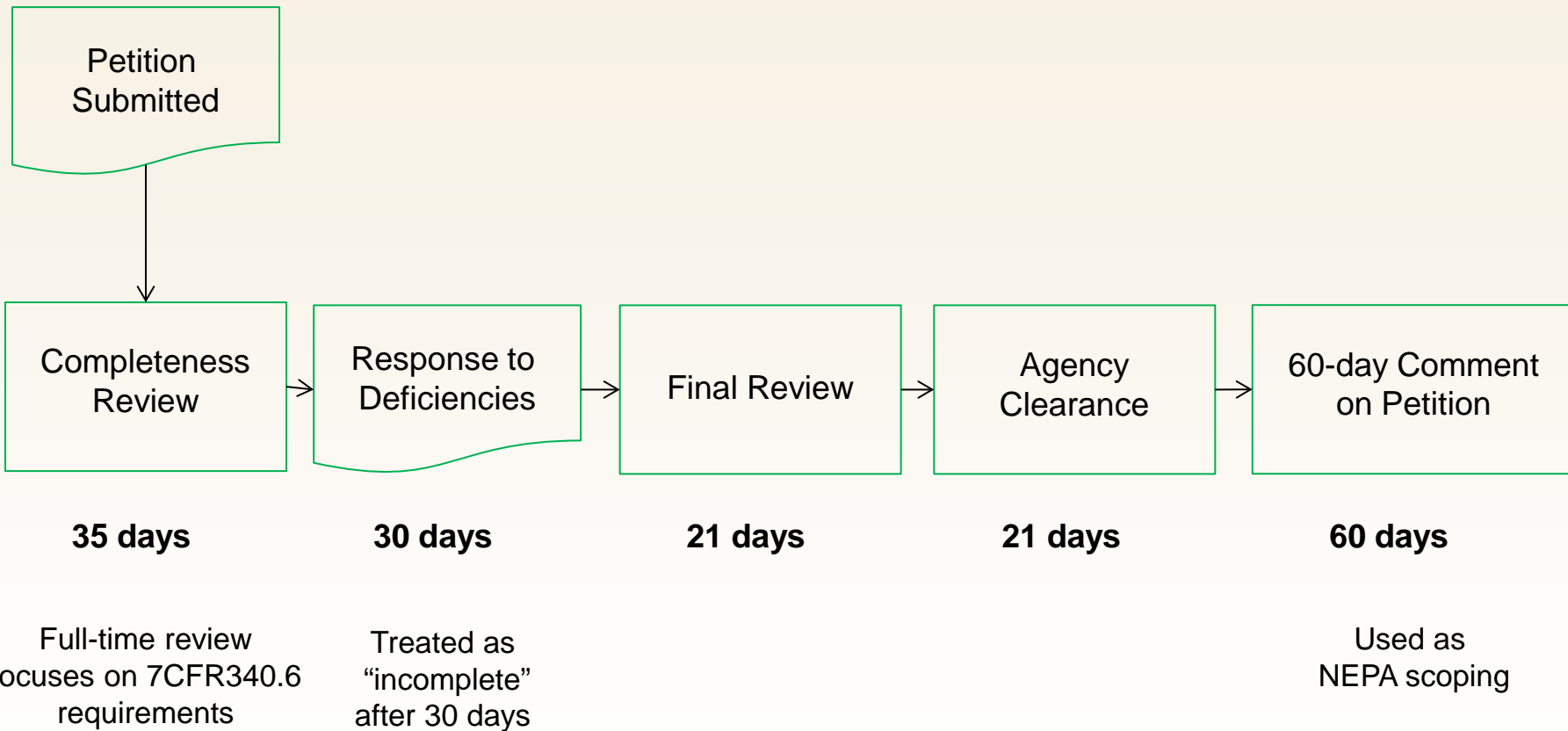
**Biotechnology Regulatory Services  
Animal and Plant Health Inspection Service**

# Petition Process Improvement

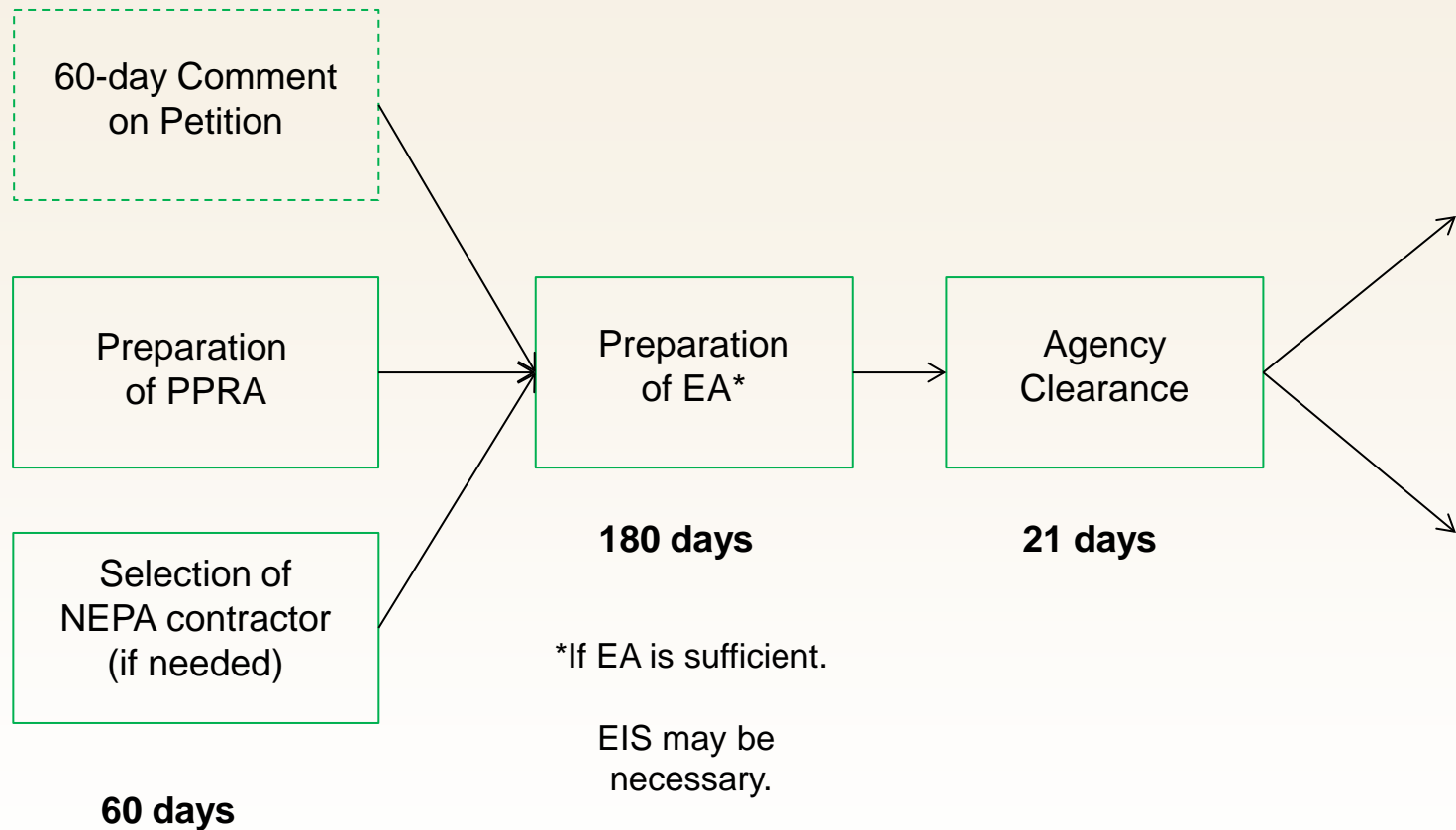
- By late 2011, 3+ years to complete petition determinations; 22 petitions in backlog
- Lean Six Sigma Process Improvements:
  - Streamlined, standardized process with defined deadlines
  - Resource management and tracking tools
  - Internally clearer separation of plant pest risk assessment and NEPA functions
  - Earlier opportunity for public involvement



# Improved Process

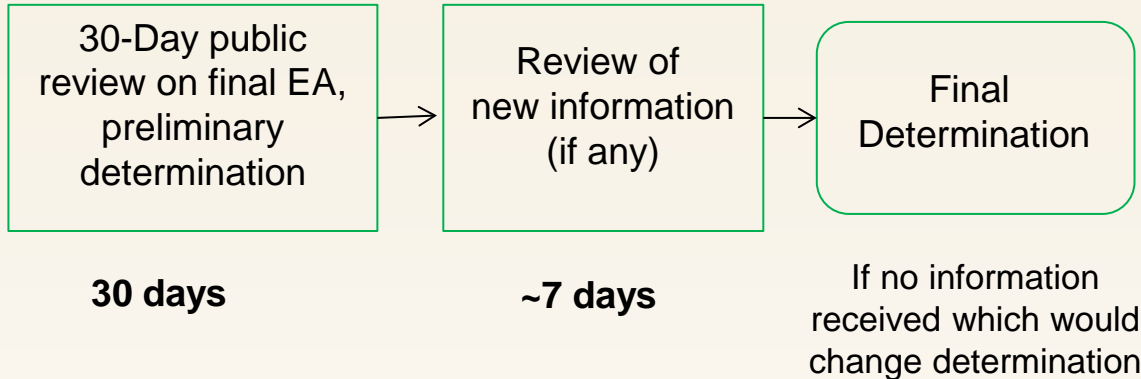


# Improved Process (cont'd.)



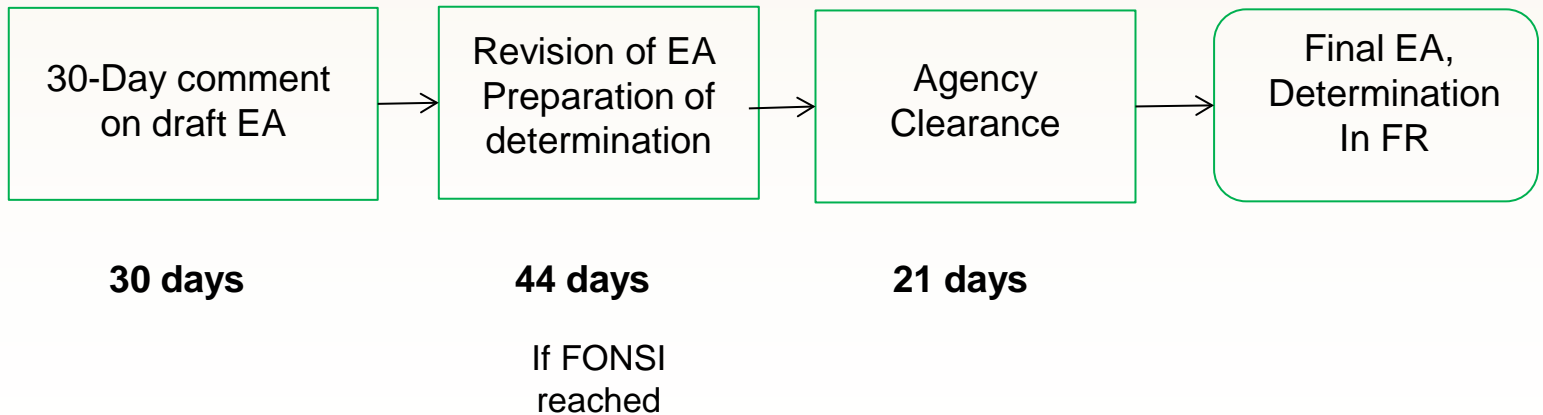
# Improved Process (cont'd.)

## Path 1 Common crop-trait combinations



or

## Path 2 New crop-trait combinations, new issues



# Transition

- Communication of process improvements in Nov 2011
  - Most changes implemented by November 2011
- Announced transition of specific petitions in March 2012
- First petitions published for new comment period in July 2012





# Progress to Date



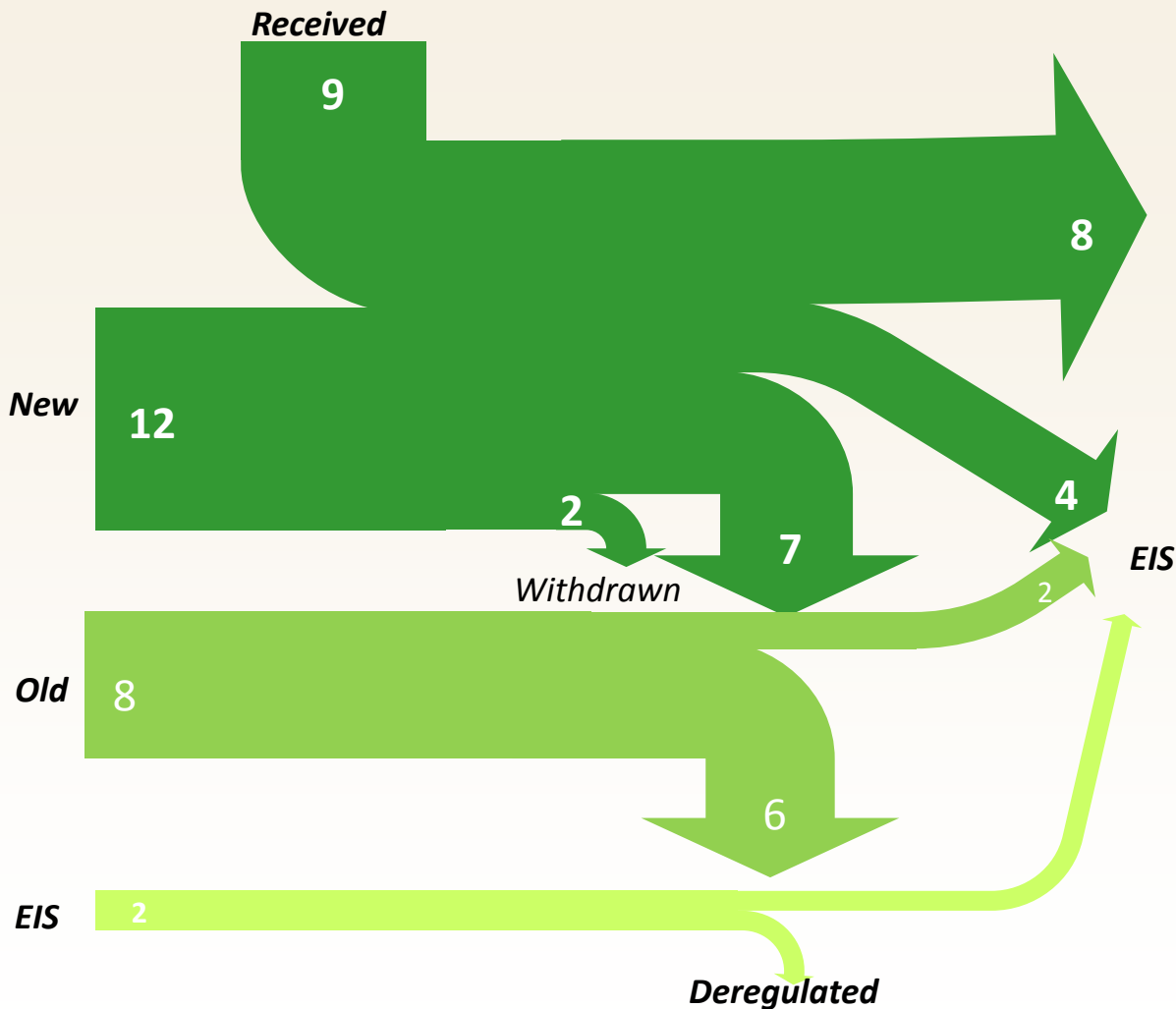
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# Petitions on the Move

## Dec 2011

- 5 Review
- 1 Waiting
- 5 PPRA
- 7 Draft EA
- 2 Final EA
- 2 EIS

**22 total**



## Nov 2013

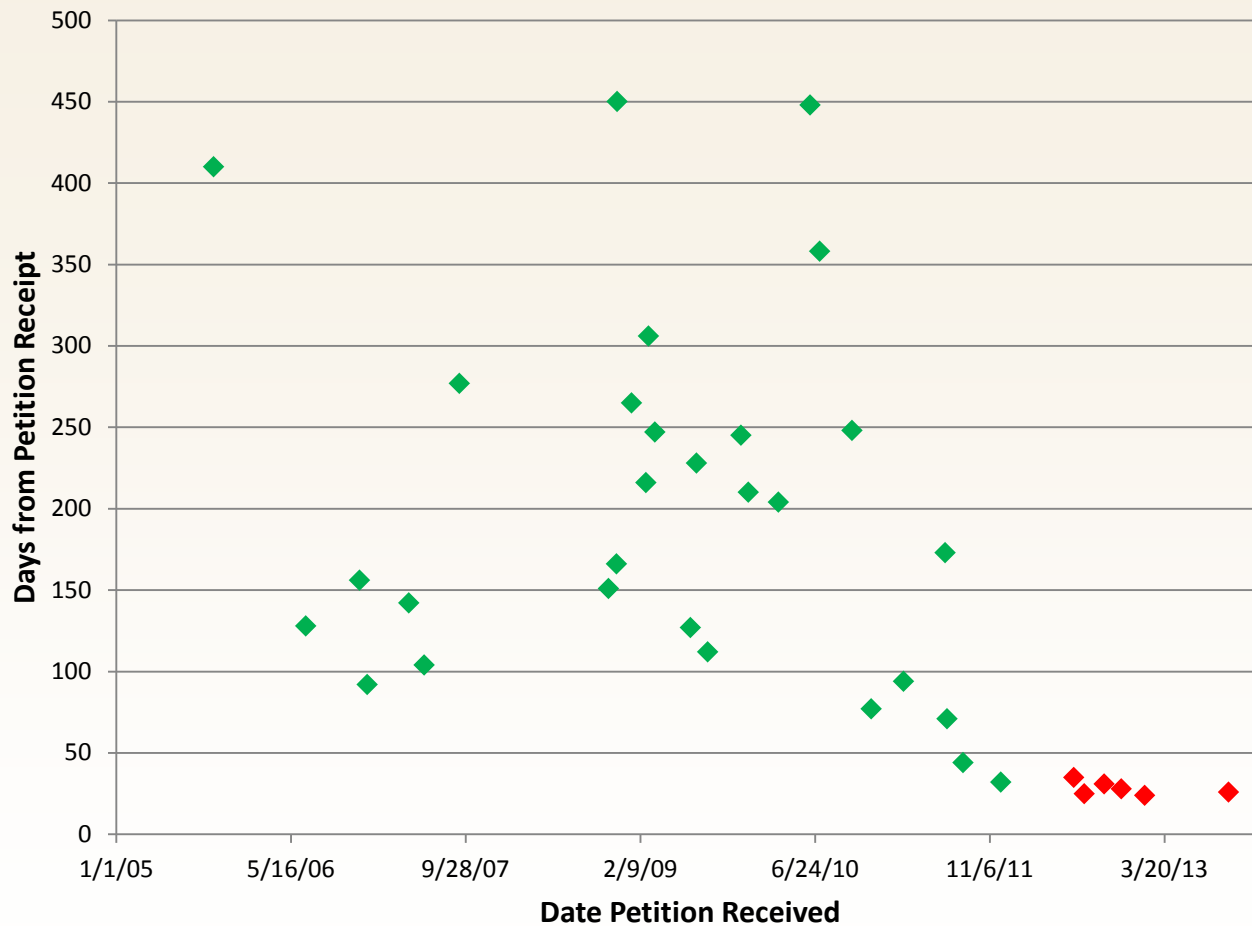
- 1 Review
- 1 Waiting
- 6 Draft EA
- 7 EIS

**15 total**





# Initial Review

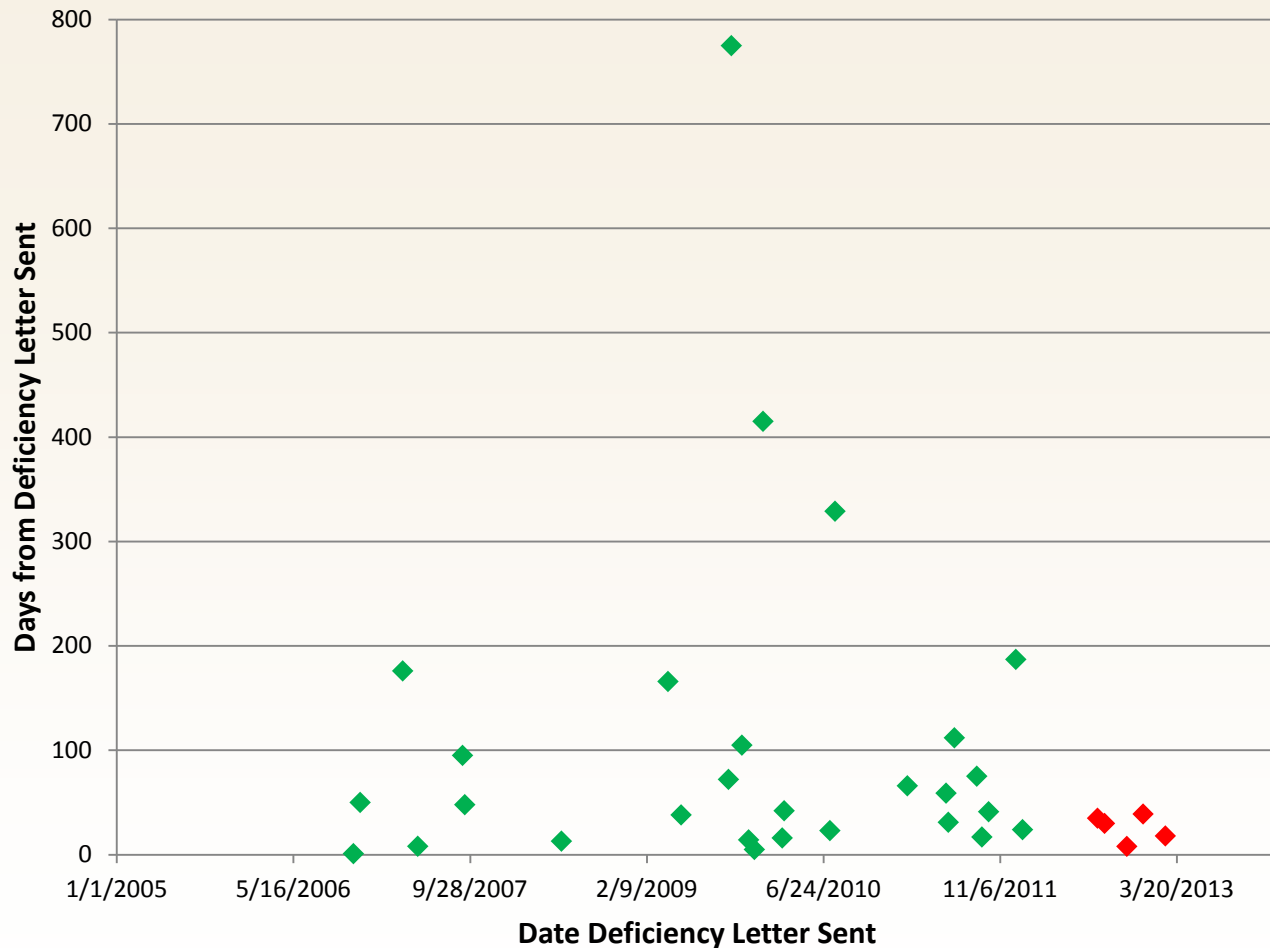


Target:	35 days
New:	28 days
Old:	205 days
Saved:	177 days

*1 pending*



# Revisions Received

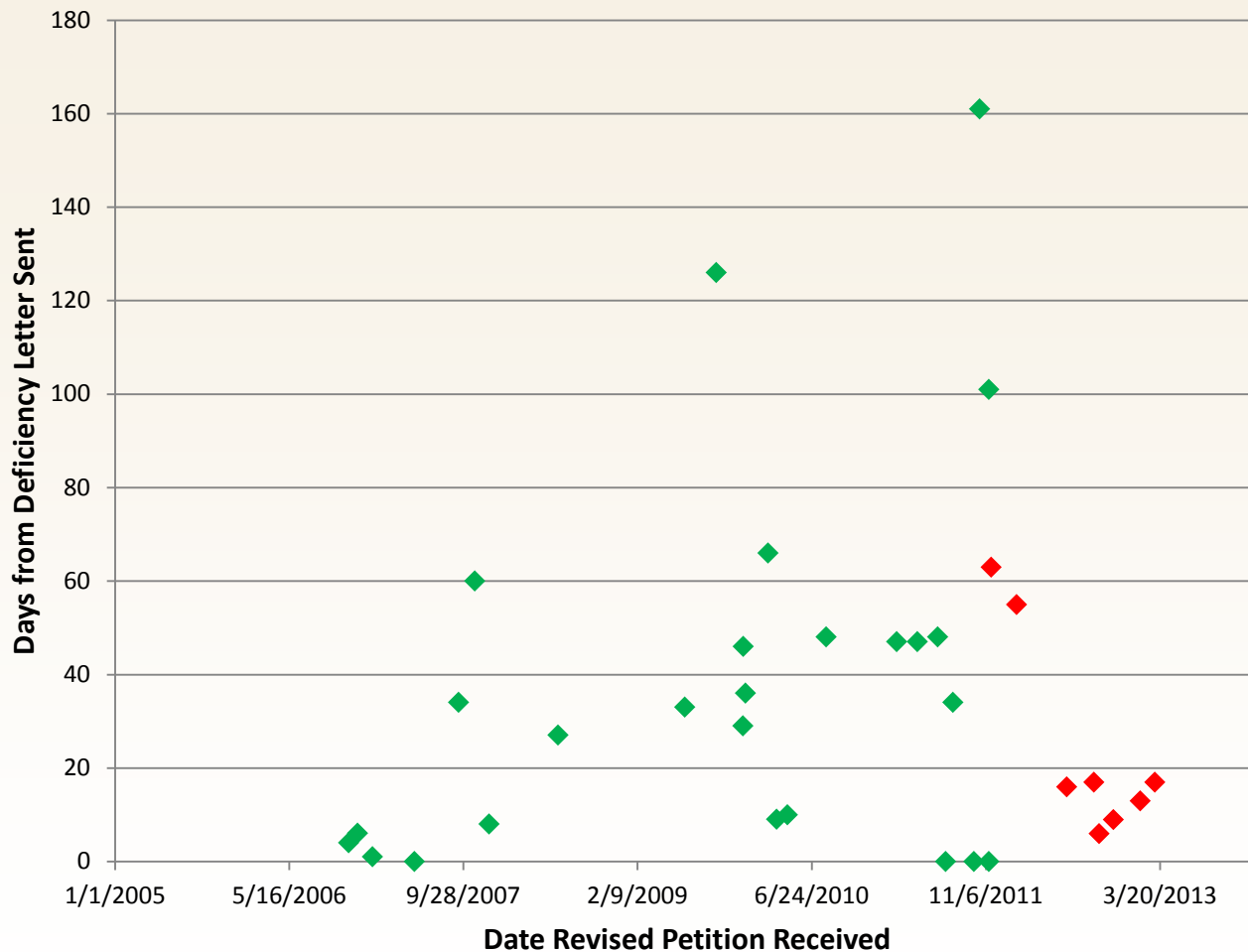


Target:	30 days
New:	26 days
Old:	107 days
Saved:	81 days

*1 pending*



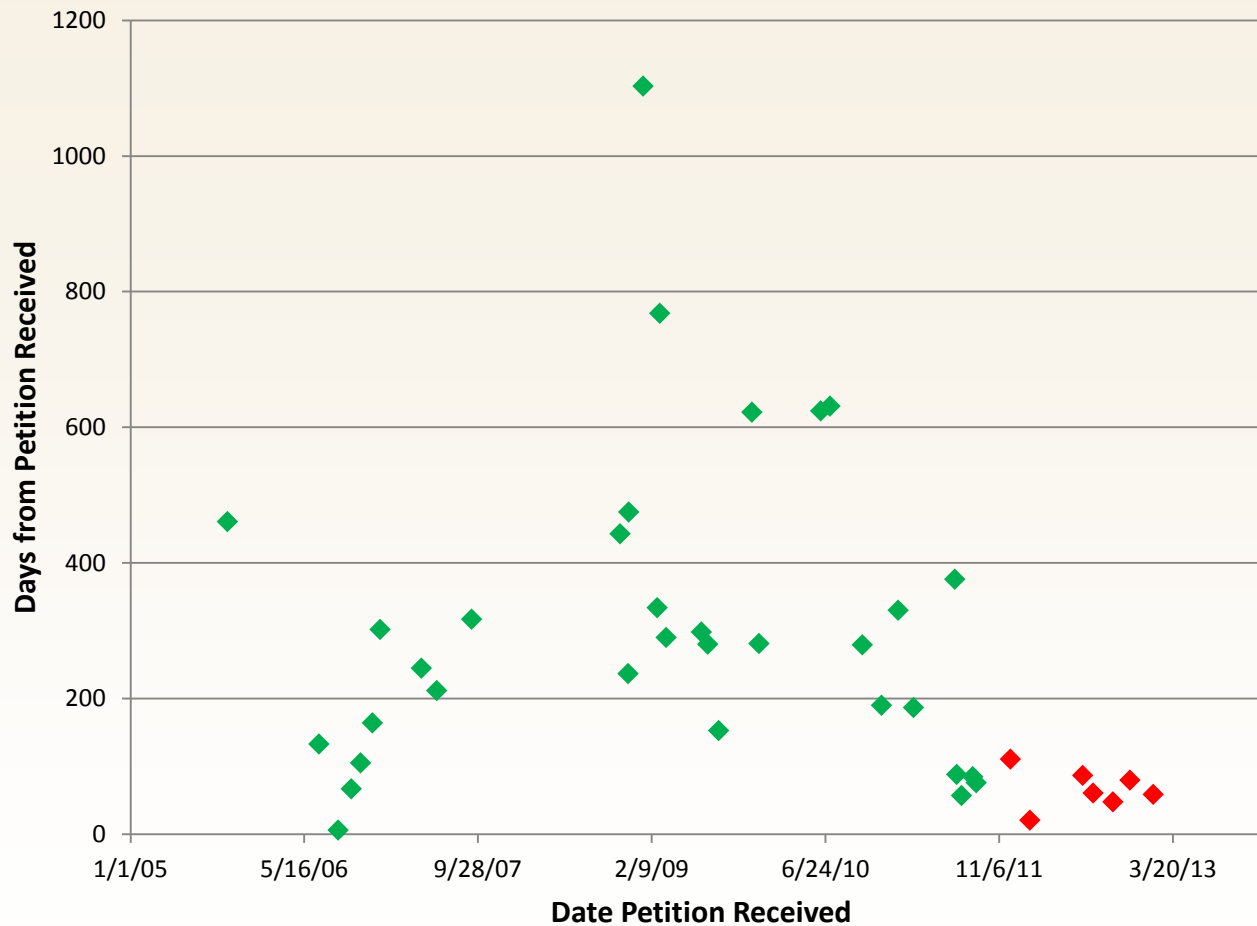
# Final Review



Target:	21 days
New:	35 days
Old:	39 days
Saved:	4 days



# Completeness Review (Overall)

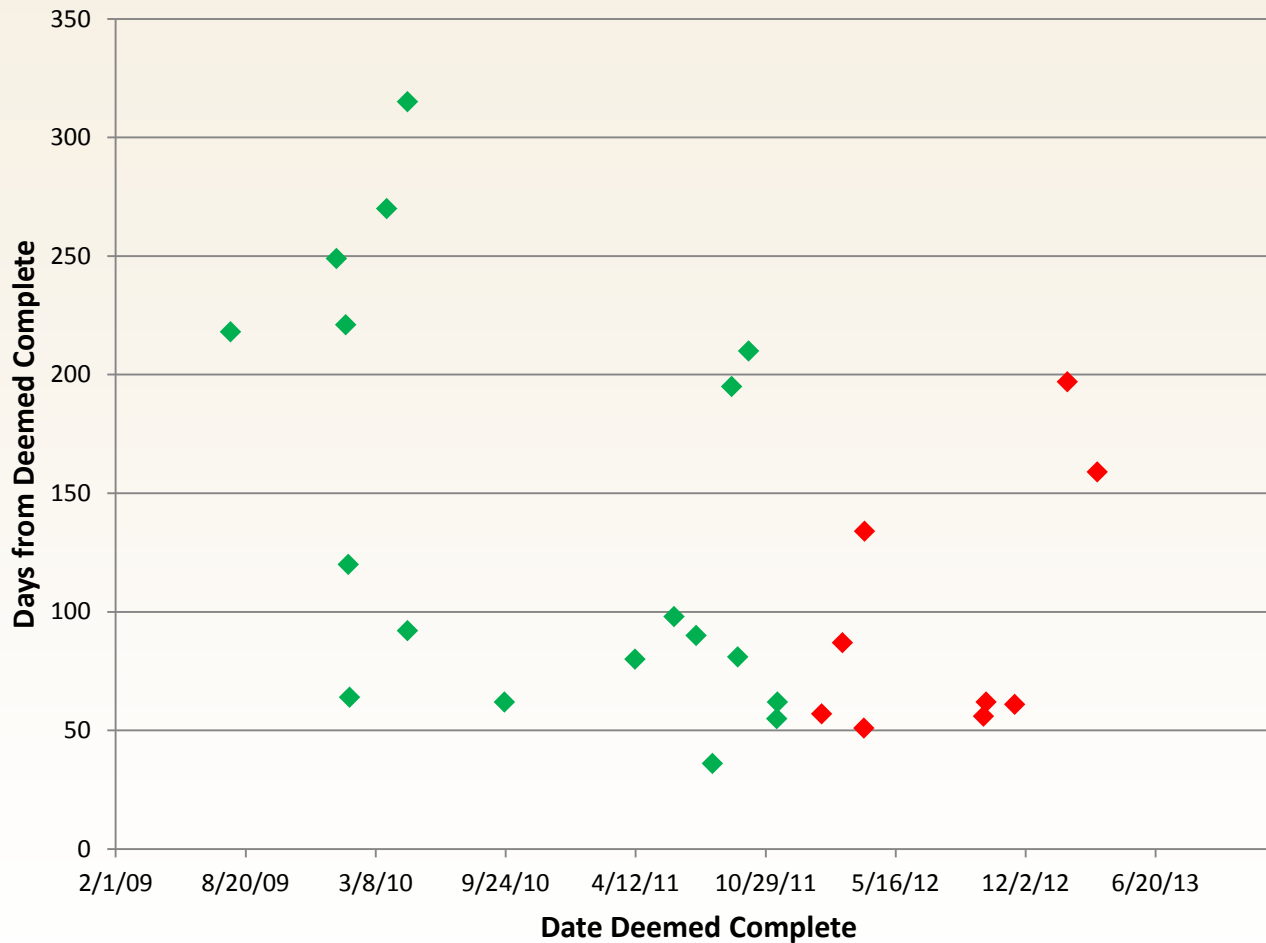


Target:	86 days
New:	65 days
Old:	324 days
Saved:	259 days

*2 pending*



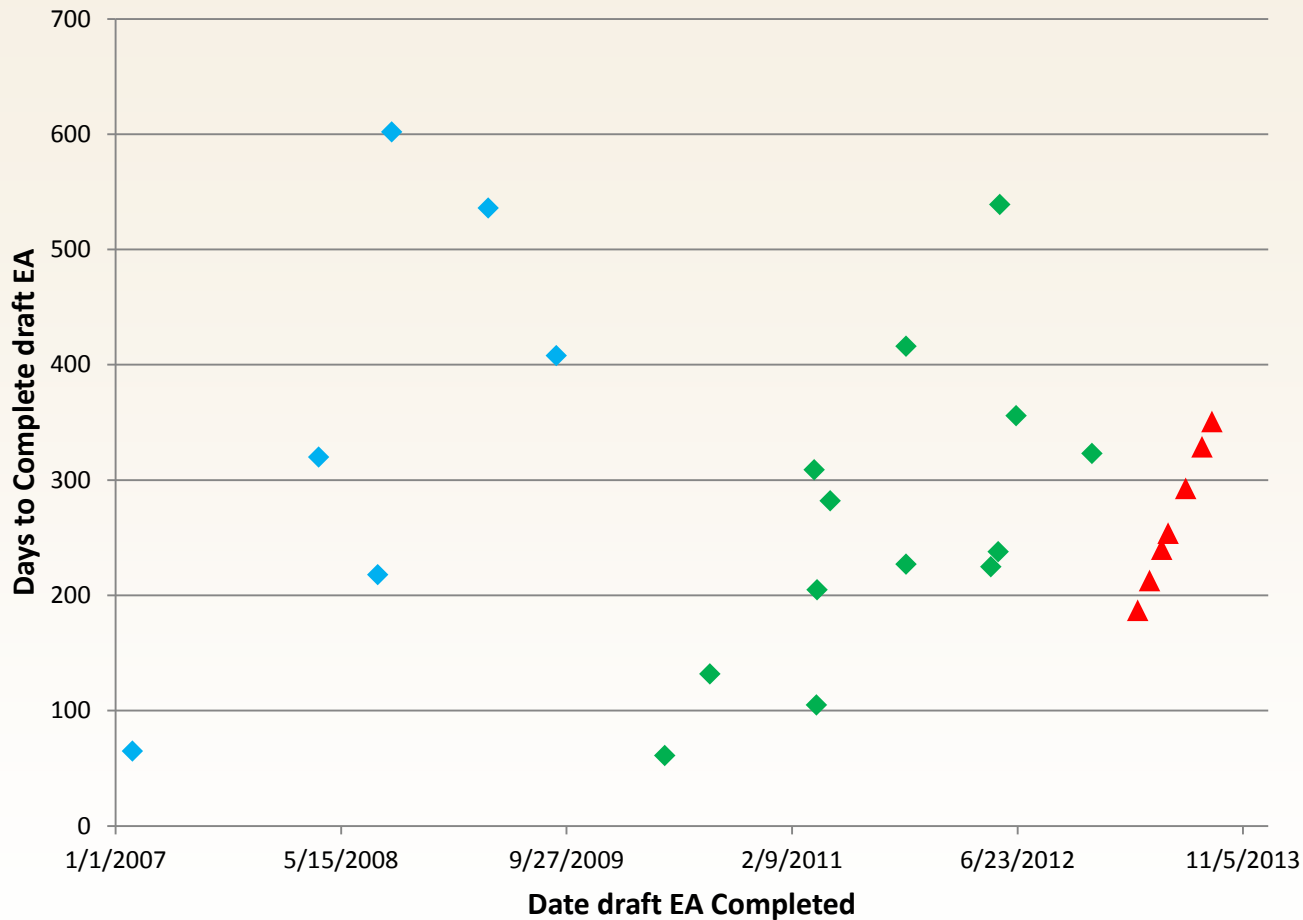
# Draft PPRA



Target:	By close of 60 day comment
New:	92 days
Old:	143 days
Saved:	51 days



# Draft EA

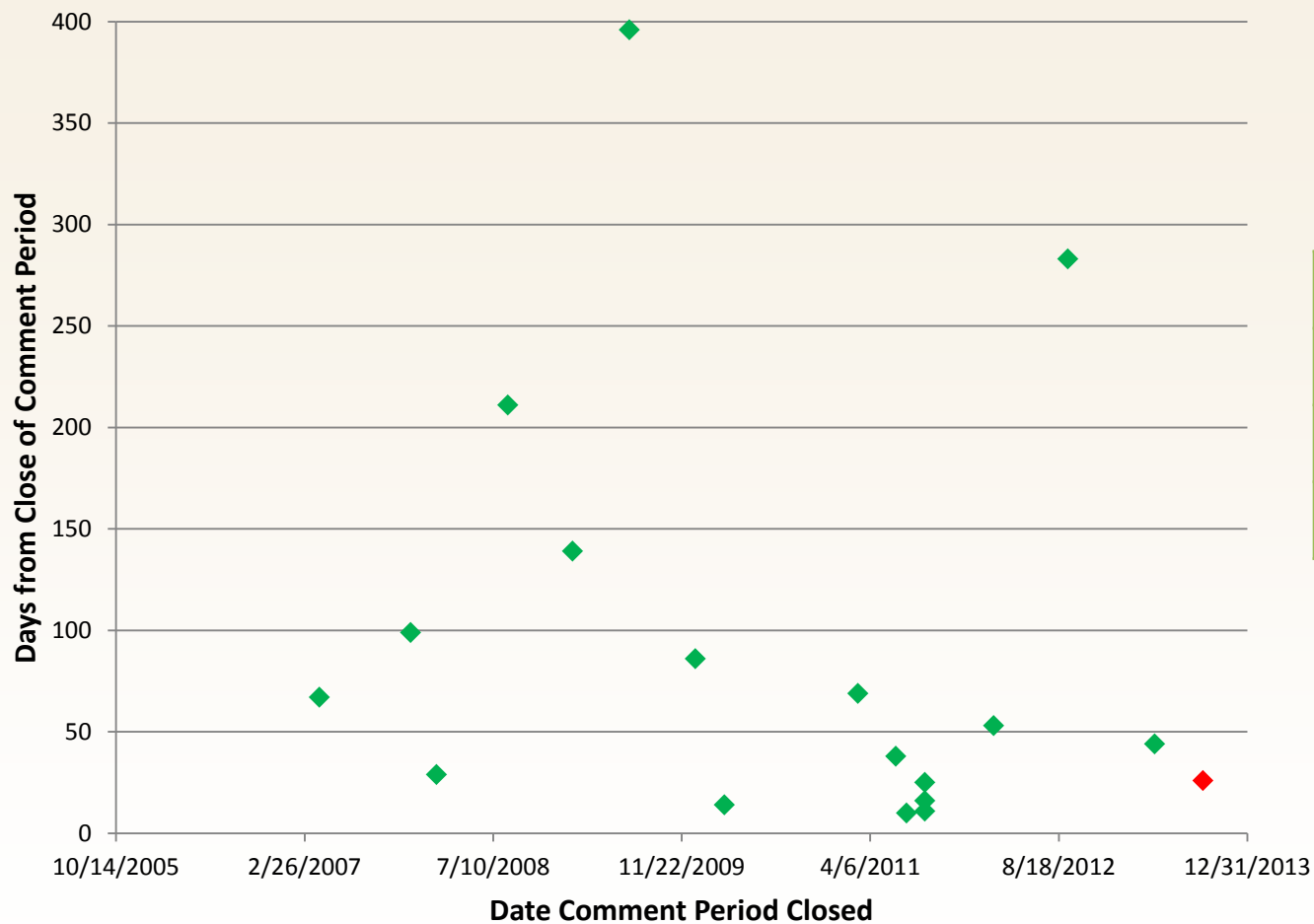


Target:	180 days
New:	267 days
Old:	213 days
Behind:	54 days

*4 pending  
2 out for comment*



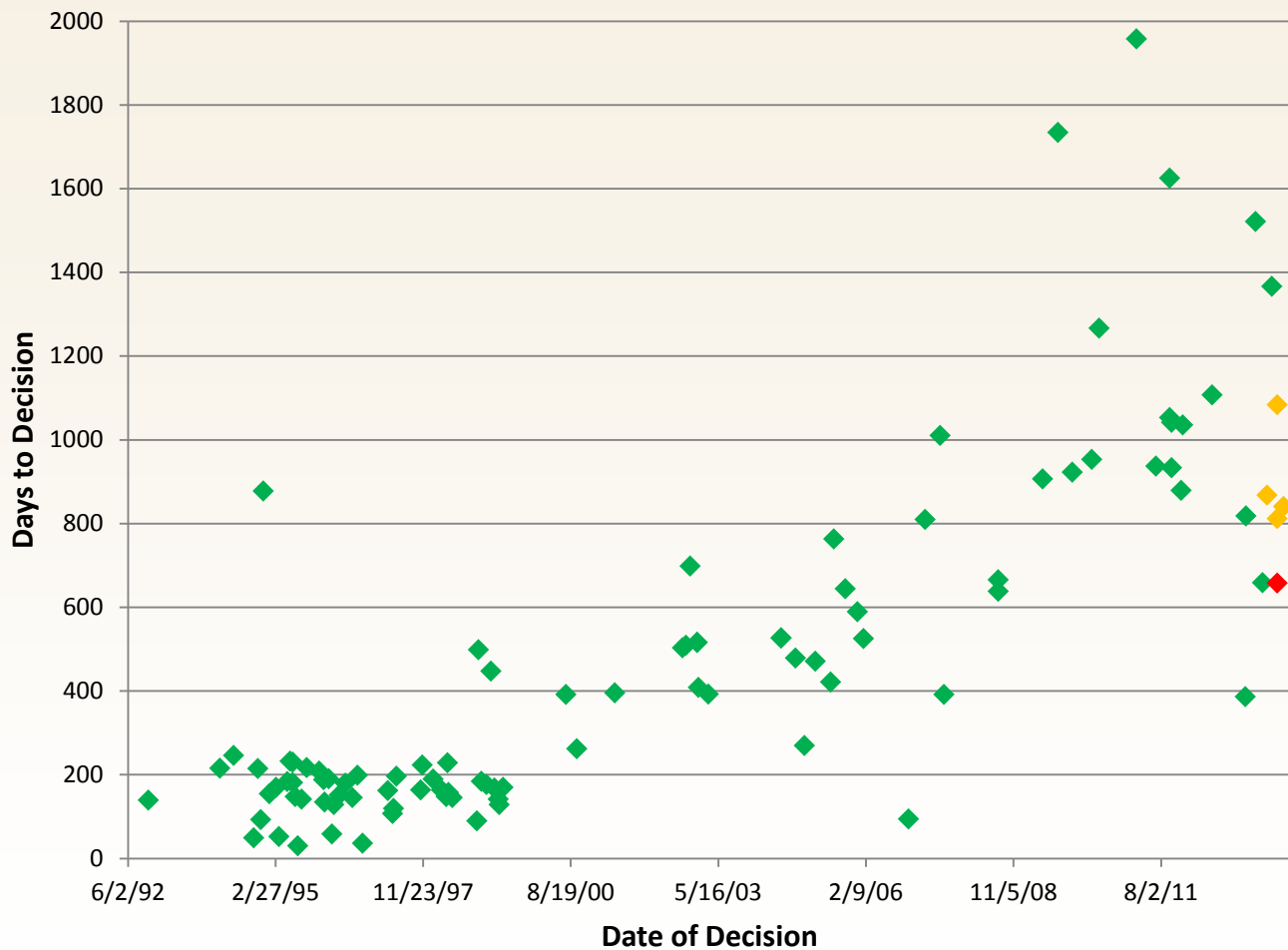
# Final EA



Target:	44 days
New:	26 days
Old:	91 days
Saved:	65 days



# Complete Process



Target:	419 days (Path 1)
New:	658 days
Old:	1034 days
Saved:	364 days







# Looking Ahead



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# Looking Ahead

- We expect decisions on most currently pending petitions in 2014
- Timelines will continue to improve as pending petitions are cleared
- We expect to routinely meet our new process timelines by early 2015



# Questions?

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