



PPQ 2025 Annual Report

The Lacey Act: Combating the Illegal Trade of Protected Plant Species

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Introduction

The U.S. Department of Agriculture’s Plant Protection and Quarantine (PPQ) program conducts activities related to the 2008 Farm Bill amendments to the Lacey Act, which prohibit the importation of any plants, with limited exceptions, that are taken or traded in violation of domestic or international laws. The Act requires a declaration for imported shipments of most plants or plant products. A 2012 study by the United Nations Environmental Programme estimated the value of illegal logging, including processing, to be between \$30 billion and \$100 billion, or from 10 to 30 percent of the global wood trade.

The Lacey Act amendments are designed to help combat this illegal logging by encouraging importers to research their supply chains and be aware of the laws governing products they purchase in other countries. PPQ’s role is to evaluate and implement existing regulations, provide guidance to importers regarding the required declaration, perform compliance checks, provide enforcement agencies with declaration information to assist their investigations, and maintain declaration records.

Lacey Act Declarations

In fiscal year (FY) 2025, PPQ received approximately 32.2 million Lacey Act declarations electronically or on paper (the vast majority were received electronically through the U.S. Department of Homeland Security's Customs and Border Protection's [CBP] Automated Commercial Environment system). Since implementing the 2008 amendments to the Lacey Act, PPQ has added products to the declaration requirement/enforcement schedule in phases.

Beginning December 1, 2024, Phase 7 required the declaration for all remaining plant product Harmonized Tariff Schedule (HTS) codes that were not 100-percent composite materials. Phase 7 covers several hundred HTS codes and includes items as varied as industrial or medicinal plants, furniture, handbags, plywood, laminated wood, tools, matches with natural wood stems, products of natural cork, products of bamboo and rattan, footwear, and more. With the full implementation of Phase 7, daily declarations increased approximately 196% compared to daily declarations filed prior to Phase 7.

In FY 2025, PPQ continued conducting outreach with Lacey Act Program Team members participating in 15 events with both American and International stakeholders. The outreach focused on Phase 7 compliance questions and revision of Foreign Trade Zone declaration compliance.

Also, in FY 2025, PPQ funded a grant with World Forest ID to conduct a pilot study testing country of harvest claims using Stable Isotope Ratio Analysis. The purpose of the grant was to demonstrate how testing methods could be used by industry to perform due care and scrutinize the stated geographical sourcing of wood products their supply chain, thereby increasing compliance with the Lacey Act declaration requirements. The pilot study successfully showed to the participating companies that wood products in their supply chain had incorrect country of harvest claims. This new testing led companies to scrutinize gaps in their due care compliance plans and increase verification activities of document-based geographical claims.

PPQ and its Federal partners (including other USDA agencies, U.S. Customs and Border Protection (CBP), the U.S. Department of Justice, and the U.S. Fish and Wildlife Service) continued to expand and improve Lacey Act compliance programs. In FY 2025, PPQ issued 251 Letters of Noncompliance to importers who submitted declarations with errors or inconsistencies to allow them to correct the issues.

Before the operations were placed on hold, PPQ and partners prepared for 6 risk assessment surveys of importers with suspect import documentation. In cooperation with CBP, PPQ reviewed documentation of 9 shipments of selected Brazilian timber products. As a result of that effort, declaration errors were identified and 4 Letters of Noncompliance were issued to those companies. PPQ provided declaration data reports to support 20 new and ongoing law enforcement investigations. Additionally, PPQ presented original research about potential violators of the Lacey Act and other U.S. laws and provided 10 referrals to the interagency Timber Working Group comprised of U.S. enforcement agencies.