



Board of Agriculture and Biosecurity
May 26, 2026
9 a.m. Plant Quarantine Branch
1849 Auiki Street
Honolulu, Hawaii 96819

**Testimony Regarding Agenda Item VI.1.
Update on Plant Quarantine Interim Rule 26-1**

Aloha Chairperson Hurd and Members of the Board of Agriculture and Biosecurity,

The Coordinating Group on Alien Pest Species (CGAPS) works to close the gaps in Hawaii's invasive species prevention and response systems. We are grateful to the Board of Agriculture and Biosecurity (Board) for approving Plant Quarantine Interim Rule 26-1 to close the gap and prevent or slow the human-assisted spread of coconut rhinoceros beetle (CRB) on Hawaii Island.

Interim Rule 26-1 is very similar to Plant Quarantine Interim Rule 22-1, adopted by the Department of Agriculture and Biosecurity (DAB) in 2022. Both interim rules use the same structure, requiring businesses that transport CRB host material to enter into Compliance Agreements, receive CRB training, and use best management practices to prevent or slow the spread of CRB. For both interim rules, DAB cooperated with partners to implement the Compliance Agreement program. For Interim Rule 22-1, DAB cooperated with CRB Response, and for Interim Rule 26-1, DAB is cooperating with the Big Island Invasive Species Committee (BIISC) and CRB Response.

We understand that cooperation has not been seamless. Interim Rule 26-1 took effect on March 25, 2026, and all covered businesses were required to complete training and enter into Compliance Agreements by May 1, 2026. However, that goal is far from being met. BIISC has offered 15 training sessions,¹ but it is unclear at this time whether DAB has signed and issued any Compliance Agreements to businesses that received the training.

For Interim Rule 26-1 to be successful, all covered businesses should enter into Compliance Agreements as soon as possible. It is important that all businesses, large and small, are treated fairly and subject to the same CRB control requirements.

The Plant Quarantine Branch (PQB) has many responsibilities and demands with domestic and interisland inspections, and as the regulatory lead on CRB and other high priority pests across

¹ <https://dab.hawaii.gov/blog/main/interim-rule-26-1-restricting-the-transportation-of-coconut-rhinoceros-beetle-host-materials-on-hawai'i-island/>

the State. It is understandable that the Compliance Agreement rollout has been slow. Going forward, we hope PQB will prioritize the implementation of the Compliance Agreement program and cooperation and communication with BIISC and CRB Response as its implementing partners. We respectfully suggest that DAB consider the following actions to jump-start the rollout of Interim Rule 26-1:

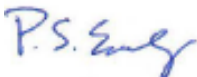
- Designating a single PQB point of contact for coordination among PQB, BIISC, and CRB Response. That point of contact should be stationed on Hawaii Island or able to visit Hawaii Island on a frequent and regular basis.
- Holding weekly coordination meetings between PQB, BIISC, and CRB Response until covered businesses have entered into Compliance Agreements to ensure the Compliance Agreement program is being implemented in a timely and equitable manner.
- Reporting back to the Board at its next meeting on progress to implement Interim Rule 26-1.

CGAPS is grateful for the Board, the Petitioners, DAB and PQB, BIISC, CRB Response, and all the stakeholders and community members who have supported the adoption and implementation of Interim Rule 26-1. Thank you for the opportunity to provide this testimony and for all your efforts to address CRB across the State.

Aloha,



Christy Martin
CGAPS Program Manager



Stephanie Easley
CGAPS Legal Fellow