



Exporting Goldenseal

Goldenseal (*Hydrastis canadensis*), native to the United States and Canada, is one of the bestselling medicinal herbs. Above ground the plant consists of a single stem, 8 to 20 inches high, that supports two wrinkled green leaves. Below ground, the most valuable part of the plant is found — the root-like rhizome, source of highly prized alkaloids.

How Is Goldenseal Listed?

Historically, despite the high volume of national and international trade, goldenseal has been mostly unregulated. However, due to concern for its sustainability in the wild, it was listed in Appendix II of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in 1997. As a result, you must obtain a CITES permit or certificate before you can export whole and sliced roots, and parts of roots. Finished products such as capsules, powders, and tinctures that contain goldenseal are not regulated under CITES and do not require CITES documents.

Why Are Permits Necessary?

To ensure that commercial demand does not threaten their survival in the wild, many wildlife species are protected by CITES, a treaty that regulates trade in listed species through a system of permits. A CITES Appendix II listing is a means of regulating and monitoring trade for species not currently threatened with extinction but vulnerable to overuse.

How Do I Apply for a Permit to Export Goldenseal?

Complete the appropriate application form and submit it with a \$25 processing fee to the Office of Management Authority. Allow at least 60 days for review of a complete application. Also contact your State agency, which deals with plant protection, for its requirements.

Your goldenseal application requires submission of information the Service needs to make two determinations:

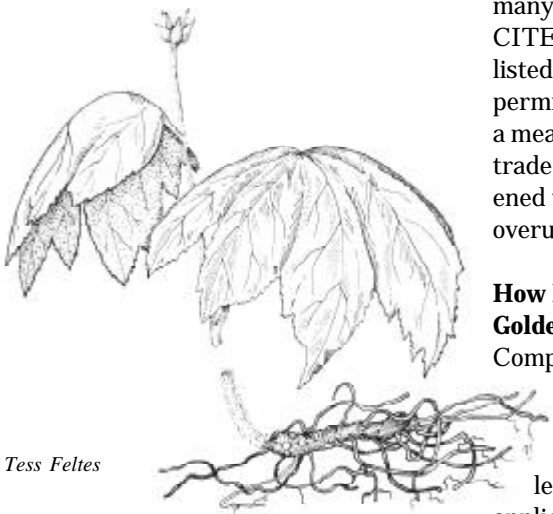
- Specimens are legally acquired: the applicant has records showing the specimens were obtained in accordance with local, State, Tribal, or Federal law.
- The export will not be detrimental to species' survival: the Service must make a finding that the export is unlikely to adversely affect the survival of the species in the wild. For goldenseal, this finding will be based on data and expert scientific opinion on the species' biological status, as well as its volume of trade.

To apply for the export of goldenseal collected in the wild: Use FWS application form 3-200-32. You will need to provide the following information:

1. The specific location, name and address of collector, and date of collection.
2. Copies of documents to show the plants were legally collected (e.g., State permits or licenses, landowner permission, etc.).
3. If you purchased the plants, the invoice or other document that shows the name, address, and telephone number of the person from whom you purchased the plants and the date of purchase.

Additional data may be requested after the application is submitted. Each export of wild-collected goldenseal requires a separate permit.

You may either submit this information with each application for an export permit, or you may choose to participate in a voluntary recordkeeping system where the exporter, dealer, and collector each keep detailed information that enable the Service to trace the goldenseal back to the collector through a



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records check. Participants with an approved voluntary recordkeeping system provide this information in a summary format with each permit application. Please contact this office for specific details.

To apply for the export of goldenseal that was cultivated: Use FWS application form 3-200-33. Although most goldenseal in trade is collected from the wild, some facilities are starting to cultivate it. A certificate for artificially propagated plants may be issued once the Service determines that the methods of cultivation meet CITES standards. You will need to show:

1. Roots, rhizomes, or seeds came from legally and non-detrimentally acquired parental stock.
2. Plants have been grown in cultivation in a controlled environment four years or more without augmentation from the wild.

This type of certificate allows for multiple shipments over four years.

To apply for the export of pre-Convention goldenseal: If you have goldenseal collected prior to September 18, 1997, the effective date of the CITES listing, you may apply for a pre-Convention certificate using FWS application form 3-200-32. You will need to provide:

1. Documents (bills of sale, inventory records, etc.) that show specimens were collected prior to the listing date.
2. If you were not the collector, you will need to provide documents to show the goldenseal was collected from the wild

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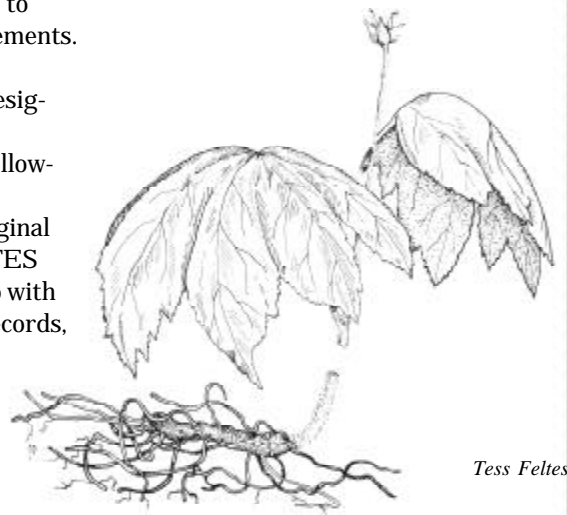
prior to the listing date, or copies of multiple transactions.

3. You may apply for a multiple-shipment certificate to export all or part of your pre-Convention stock in the next 2 years. However, with each application, provide documentation for both the total amount of pre-Convention stock you currently own and the export amount.

What Steps Should I Take to Export Goldenseal?

1. Contact your State plant conservation agency and comply with its requirements.
2. Apply for a permit from this office, allowing at least 60 days for the processing of an application.
3. Check that the CITES permit or certificate is accurate and valid before presenting your goldenseal for export.
4. In addition to the Service, the U.S. Department of Agriculture (USDA) administers a permit program for CITES-protected and endangered plants. Obtain a General Permit from the USDA, Animal and Plant Health Inspection Service, Division of Plant Protection and Quarantine (APHIS/PPQ), 4700 River Road, Riverdale, Maryland 20737-1236; (301) 734-8645 for PPQ Permitting. For a permit application using the PPQ FAX Service, call (301) 734-4327.
5. Contact the CITES Management Authority in the country of import to obtain information on their requirements.

6. Export through a USDA port designated for CITES plants. For each shipment, you must present the following to an APHIS/PPQ inspector: goldenseal being exported; the original and three copies of completed CITES permit or certificate (original to go with the shipment, one copy for your records, and the second and third to be collected by the port inspector); and a shipper's invoice. The port inspector will stamp, sign, and date the CITES documents to validate them for export after a satisfactory inspection of the goldenseal and documents.



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