USDA APHIS No-Permit Guideline Decision Tree

Selected guidelines for research materials. Follow the questions in order. Green indicates the suggested guideline.

START
Identify the material

1. Was it produced entirely by chemical synthesis (no PCR or other amplification), with no animal, microbial, or cell-culture material at any step?

YES

1a. Is it a nucleic acid containing sequences homologous to livestock/poultry genes, or to organisms or vectors known to cause or transmit their diseases?

YES

ADDITIONAL REVIEW REQUIRED
Permit likely required

NO

USE GUIDELINE 1105
Chemically synthesized material

NO

2. Is it a microorganism or a product of microbial culture or fermentation?

YES

2a. Is the organism or vector pathogenic to livestock/poultry, or does it contain or express their disease-agent genes or antigens?

YES

ADDITIONAL REVIEW REQUIRED
Permit likely required

NO

2b. Was a recombinant microorganism or construct used to make it, or is it itself a recombinant microorganism? (e.g., plasmid with insert, recombinant protein)

YES

USE GUIDELINE 1114
Recombinant Microbes and Their Products

NO

2c. Is it the microorganism itself, or an extract of it (e.g., genomic DNA/RNA)? (not a plasmid or expressed product)

YES

USE GUIDELINE 1116
Non-Pathogenic Microorganisms (and their extracts)

If the 1110 vs. 1114 distinction is unclear, review both guidelines.

NO

USE GUIDELINE 1110
Microbially Produced Materials

NO

3. Is it a cell line, cell culture, or cell-line product, including a monoclonal antibody?

YES

3a. Is it livestock/avian origin, exposed to their disease agents, carrying/expressing their genes, or an antibody targeting them?

YES

ADDITIONAL REVIEW REQUIRED
Permit likely required

NO

3b. Is it for in vitro use only?

YES

USE GUIDELINE 1120
Cell Cultures/Lines, Recombinant Cell Cultures/Lines, and Their Products (for in vitro use)

NO

ADDITIONAL REVIEW REQUIRED
Permit likely required

NO

4. Was the animal inoculated with or exposed to livestock/poultry disease agents, or does it come from a facility working with exotic livestock/poultry disease agents?

YES

ADDITIONAL REVIEW REQUIRED
Permit likely required

NO

5. What species did the tissue, blood, or DNA come from?

- Non-human primate → **USE GUIDELINE 1101** — Non-Human Primate Material (excluding cell cultures)
- Dog or cat → **USE GUIDELINE 1102** — Feline and Canine Material
- Laboratory Mammals: Transgenic/knock-out mice or rats, hamsters, gerbils, guinea pigs, rabbits, ferrets → **USE GUIDELINE 1103** — Live Laboratory Mammals and Their Material (for research purposes)
- Fish, amphibian, reptile, aquatic invertebrate → **USE GUIDELINE 1104** — Amphibians, Fish, Reptiles, Shellfish and Aquatic Species (includes venom)
- Livestock or poultry → **ADDITIONAL REVIEW REQUIRED** — Livestock or poultry material
- Other / not listed → **ADDITIONAL REVIEW REQUIRED** — Species not on this chart (e.g., minipig, hedgehogs, poultry)
- Human → **GENERALLY OUTSIDE APHIS VS SCOPE** — Identify as HUMAN on commercial invoice AND CDC statement No statement required

Always declare animal-derived additives (FBS, tryptone, albumin). Mixed shipments: classify each component separately.

BEFORE PREPARING A USDA STATEMENT: confirm on the APHIS website that the material meets all criteria and exclusions of the suggested guideline. If it does not qualify, a permit may be required. The APHIS website is the controlling source.

Guidelines: Animal Products That Do Not Require Import Permit | APHIS
https://www.aphis.usda.gov/animal-product-import/no-permit-required