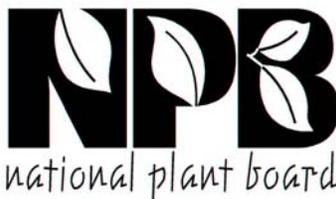


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October 29, 2009

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Ms. Rebecca Bech
Deputy Administrator for Plant Protection and Quarantine
USDA, APHIS, PPQ
Jamie L. Whitten Federal Building
14th Street and Independence Avenue, SW
Room 301-E
Washington, DC 20250

Dear Rebecca:

The purpose of this letter is to continue to emphasize the National Plant Board's continuing concerns related to the enforcement of Solid Wood Packing Material (SWPM) regulations. We encourage USDA, APHIS, PPQ to work jointly with the states and Customs and Border Protection (CBP) to prevent the introduction of serious wood pests such as Asian longhorned beetle, emerald ash borer and other insect pests into our states. As a part of this protection, we are also requesting that CBP work to identify serious violators and fraudulently-marked SWPM in order to preclude serious pests from entering the U.S. Finally, it is our hope there is cooperation among the federal partners in order to ensure the tools and technical resources are available to identify high risk SWPM. It is urgent that USDA, APHIS, PPQ and Customs & Border Protection (CBP) work together to strengthen the SWPM compliance policies. This issue was raised during our series of meetings at the regional level and we feel it is critical to further emphasize its importance from a national perspective.

The introduction of wood pests such as Asian longhorned beetle, emerald ash borer, and other serious wood pests would be devastating to our timber and nursery industry, as well as our native forests, urban landscapes, and homeowners. Our NPB membership continues to monitor our neighboring states and Canada closely reviewing the status of repeat introductions and spread. It has been noted in recent news articles, the Government of Canada has placed additional restrictions on SWPM from China. Canada cited continuing problems with International Plant Protection Convention marked SWPM that was found to have live pests. It should be noted, the refusal of non-compliant shipments has not created the sufficient incentive needed for the trade community to fully comply with 7 CFR 319.40 regulations. As such, there is a need to prohibit or increase restrictions on SWPM products from countries with high violation rates and to impose stronger penalties against the violators to prevent further violations.

The following recommendations were shared in earlier correspondence through the regional plant boards; however, the NPB would like to continue with further dialogue from the national perspective:

1. The NPB recommends that a thorough review of the SWPM Program be conducted, specifically to identify the weak links in the system and to take corrective measures to reduce the overall pest risk. As part of this review, statistical data is needed showing the effectiveness of the program.
2. The NPB recommends that current policies be revised in order to target high risk SWPM for inspection and to issue penalties and increase deterrents for SWPM violations.
3. The NPB recommends that SWPM be prohibited from countries with high levels of fraudulent stamp use, pest infestations, and other similar violations.
4. The NPB recommends that prohibitions, additional treatments, or bans be placed on SWPM from any country that has been issued numerous violations until it can be verified the problem has been corrected.

If I can provide additional background regarding this issue, please do not hesitate to let me know. The NPB membership remains willing to work cooperatively with the federal agencies and member states to effectively address this critical issue.

Sincerely,



Carl P. Schulze
NPB President

cc: Jayson Ahern, Acting Commissioner, U.S. Customs and Border Protection
Thomas Winkowski, Assistant Commissioner, Field Operations
Secretary Tom Vilsack, Agriculture
John Ferrell, Undersecretary for Marketing and Regulatory Programs, USDA,
APHIS
Cindy Smith, Administrator, USDA, APHIS
Stephen Haterius, Executive Director NASDA
Vic Harabin, Eastern Regional Director, USDA, APHIS, PPQ
Phil Garcia, Western Regional Director, USDA, APHIS, PPQ
NPB Regional Plant Board Presidents