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September 28, 2010

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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 (NPB) continuing support for the movement of certified citrus nursery plant material to non-citrus producing states and the continued funding of the Citrus Health Response Program

Citrus production remains important to the agricultural economy of citrus-producing states stretching from Florida through Alabama, Louisiana, Texas, and Arizona to California. It contributes \$9 billion annually to Florida's state's economy, nearly \$2 billion in California and over \$200 million in Texas each year. Citrus fruit, including oranges, grapefruit, tangerines, limes, lemons and satsumas are an important part of a healthy diet and enjoyed by people throughout the country. In some cultures, citrus is an important part of cultural traditions and ceremonies, including the giving bouquets of kumquats for Chinese New Year. Even in colder states, people enjoy having a citrus plant for their patio or greenhouse.

Unfortunately, this vital industry and the enjoyment of U.S.-produced citrus fruit and juice is threatened by the introduction and spread of serious exotic citrus pests and diseases such as citrus canker, citrus greening, citrus black spot and the Asian citrus psyllid, the vector for greening.

As part of the Clean Plant Health Network Continuum, the Citrus Health Response Program is proving to be a well-founded effort to minimize the transport of citrus pests in citrus nursery plant material. Plants derived from clean plant sources and then grown in approved screened greenhouses and under monthly inspections, such as is currently done in Florida, are practical safeguards to significantly mitigate the chance of moving citrus pests and pathogens.

The NPB has confirmed the threat of movement of non-certified plants, which are not grown under current adopted citrus health protocols, is high and likely leads to the establishment of citrus greening in several states. Conversely, allowing the movement of plants grown and certified under current protocols will reduce the overall likelihood that infested plants will be moved, particularly if citrus plant material movement is limited to non citrus-producing states.

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

1. The NPB recommends the USDA-APHIS-PPQ Federal Order and regulations be amended to achievable standards as soon as possible to allow the movement of citrus nursery stock grown under the National Clean Plant Network standards and Citrus Health Response Program now in place to non-citrus producing states.
2. The NPB recommends USDA-APHIS-PPQ continue to fund the Citrus Health Response Program at a level that will allow for the movement of fresh citrus fruit in interstate and international commerce, provide adequate safeguards for clean citrus nursery stock production, and a level of general survey to detect exotic citrus pests and diseases should they be introduced into citrus-producing areas of the U.S.

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 Schulze, President

cc: Vic Harabin, Eastern Regional Director, USDA, APHIS, PPQ
Phil Garcia, Western Regional Director, USDA, APHIS, PPQ
Regional Plant Board Presidents
Amy Mann, NASDA