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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, S.W.
Room 301-E
Washington, D.C. 20250

Dear Rebecca:

The National Plant Board (NPB) requests that USDA, APHIS, PPQ re-evaluate its current position limiting the location of irradiation quarantine facilities in southern tier states and establish a regulatory framework for new facilities in the region that fully mitigates pest risk and provides for the safe movement of agricultural products into and of the United States.

The movement of fresh fruits and vegetables and other fresh agricultural products, including, cut flowers, foliage and potted plants, into the U.S. through Southern Border States presents a major pathway for the introduction and new pests into the U.S. Currently, USDA, APHIS, PPQ regulations prohibit the quarantine treatment of fresh fruits and vegetables by irradiation through irradiation facilities located in southern tier states, with the exception of facilities that may be established in Gulfport, MS, Wilmington, NC and Atlanta, GA under special conditions that allow for the safe transport of regulated articles to these treatment facilities. However, at the present time, these facilities have not been developed.

The utility of irradiation as a post-harvest quarantine treatment is now widely recognized by industry and there is growing interest in having treatment facilities at other strategic locations in the southern tier states to facilitate the safe movement of commodities entering and leaving U.S. under quarantine regulatory oversight.

These oversight procedures are now being developed to allow the movement of agricultural products into the U.S. through commercial irradiation facilities in Mexico, Philippines, Thailand, Vietnam, India and other areas.

Rebecca Bech
September 28, 2010
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I sincerely appreciate the opportunity to review this issue with you. If I can provide additional information or clarification, please do not hesitate to let me know.

Sincerely,

A handwritten signature in black ink that reads "Carl P. Schulze". The signature is written in a cursive style with a large, stylized initial "C".

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