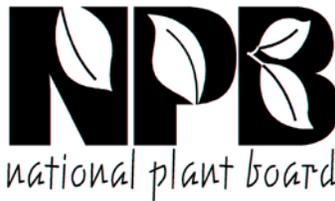


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September 28, 2010

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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, D.C. 20250

Dear Rebecca:

The National Plant Board (NPB) is requesting that USDA, APHIS, PPQ consider and adopt a regulation or policy requiring phytosanitary certificates from the country of origin for plant products shipped in personal baggage. Phytosanitary certification provides a method for safeguarding and mitigating pest risk for imported plant products. Such safeguards are needed in addition to port of entry inspection of plant products in order to eliminate pest introduction such as light brown apple moth (LBAM), gladiolus rust, and grape berry moth, which may enter the United States on regulated cargo or passenger baggage.

Requiring phytosanitary certification for commodity shipments is a common practice among our trading partners and under IPPC standards, it is the obligation of the National Plant Protection Organization of the exporting country. However, phytosanitary certificates have not been required to import fruits and vegetables into the United States. In the past, USDA, APHIS, PPQ officers and now, the Department of Homeland Security's CBP officers inspect imported produce and travelers' baggage for prohibited agricultural products.

In recent years, opportunities for international commerce and travel have reached unprecedented levels resulting in large volumes of commercial and noncommercial shipments of fruits and vegetables imported into the United States by shippers, travelers, and other individuals. Unfortunately, the number of potential pathways for the movement and introduction of foreign, invasive plant pests has increased with this boom in global trade and travel. More products grown under commercial practices are traded internationally and more products are being carried in passenger baggage, both posing risks to U.S. agriculture.

In 2001, APHIS published a proposed rule to require phytosanitary certificates for commercial shipments as well as shipments imported for personal use by airline passengers. However, the rule was subsequently withdrawn. In 2006, APHIS completed a draft pest risk assessment for passenger baggage, which demonstrated a relatively higher risk of produce in air passenger baggage as compared with commercial shipments and produce brought through land border ports. APHIS subsequently published a notice in the *Federal Register* making the risk assessment available to the public and requesting comment on the assessment and the intention to proceed with a final rule for only air passenger baggage. The rule however, was withdrawn again, over concerns about the impact on the travelling public.

Pest pathways are difficult to trace back once an outbreak occurs, but several very serious pests that now affect U.S. crops could potentially have entered the country through shipments of fruits and vegetables that may have been kept out, if they been inspected and obtained a phytosanitary certificate from the exporting country. As such, the NPB is requesting that USDA, APHIS, PPQ move forward with a rule to require phytosanitary certificates for plant products in passenger baggage, but to also explore requirements for phytosanitary certificates for commercial shipments of fruit, vegetables, and cut flowers.

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 "C" and "S".

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