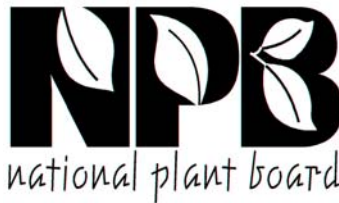


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October 24, 2011

Ms. Rebecca Bech

Deputy Administrator for Plant Protection and Quarantine
USDA-APHIS

Jamie L. Whitten Federal Building
14th Street and Independence Avenue, SW
Room 301-E
Washington, DC 20250

Dear Rebecca:

The purpose of this correspondence is to request that USDA, APHIS, PPQ consider modifying the current phytosanitary requirements for importation of chrysanthemums to include propagative material only and to designate chrysanthemum white rust (CWR) as a regulated non-quarantine pest. Coupled with these changes, the National Plant Board also encourages USDA, APHIS, PPQ to explore educational opportunities, in cooperation with industry and the National Institute for Food and Agriculture, focusing on integrated pest management (IPM) for retailers and small producers serving to reduce the economic impact should a crop be infected.

As outlined in 7 CFR 319.27, CWR is a quarantined pest, requiring eradication when detected in cut flowers, retail outlets, propagation, or production facilities. The requirement of eradication through destruction has severe economic impacts on both small and large-scale producers of chrysanthemums, yet minimal overall impact on CWR in the industry and environment.

CWR is considered a weak pathogen with regards to overwintering, spore viability, and dispersal. From a response perspective, related IPM systems for this pest are well defined and significantly contribute to a reduction in the risk and spread of CWR. In 2009, Emergency and Domestic Programs and Plant Health Programs suggested the current import regulation be revised through rulemaking to change the phytosanitary requirements for importation of chrysanthemum to propagative material only, designating CWR as a Regulated Non Quarantine Pest (RNQP).

Under this recommendation, changes to domestic eradication protocol would include:

- The regulated articles would be the cuttings produced for interstate commerce to growers for increase.
- USDA, APHIS and/or state cooperators would conduct inspections of propagators' operations to verify compliance.
- The federal protocol for eradication in grower and retail establishments would be fully discontinued.

Rebecca Bech
October 20, 2011
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It is expected this science-based, practical approach would ease the regulatory and financial burden on small growers and retailers, yet protect large domestic propagators from imported infected cuttings.

I sincerely appreciate your continued assistance with this issue. Please do not hesitate to contact me if you have questions or need additional support information.

Sincerely,

A handwritten signature in black ink that reads "Michael E Cooper". The signature is written in a cursive, slightly slanted style.

Mike Cooper
President

National Plant Board Regional Presidents
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