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September 4, 2013

Osama El-Lissy  
Deputy Administrator  
USDA, APHIS, PPQ  
Room 301-E, J. L. Whitten Federal Building  
14<sup>th</sup> Street and Independence Avenue SW  
Room 301-E  
Washington, DC 20250

Dear Osama:

The USDA APHIS PPQ is responsible for administering the Export Certification Program to facilitate the trade in U.S. plants and plant products, and ensure that these products being shipped from the U.S. meet the entry requirements of the receiving country. USDA has entered into cooperative relationships with individual states, through Memorandums of Understanding, to perform export certification duties, including inspections and issuance of certificates. This cooperative relationship has been beneficial to both regulatory parties and also the nation's agricultural industries.

However, members of the National Plant Board are concerned by significant discrepancies in the content of direction being provided to states by USDA, and the inconsistencies in how procedures and protocols are implemented by state and federal officials. Currently, responses to questions are often highly variable between Export Certification Specialists (ECS). The protocols and methods by which certification is determined also can be highly variable, between both state and federal Accredited Certifying Officials. These discrepancies and inconsistencies are confusing for state regulatory officials and exporters, create conflict between states, put exporters at a competitive disadvantage, and impede and disrupt trade.

The National Plant Boards requests that USDA APHIS PPQ implement training and coordination activities for the ECS's, necessary to improve the accuracy and consistency of information being provided to states related to export certification. The Nation Plant Board also requests that a "Phyto Notes" section should be implemented in PExD, similar to what was once available in EXERPT, to serve as an official repository for interpretations, opinions, guidelines and policies until they could be incorporated into the Export Certification Manual.

Additionally, a review of the National Seed Health System (NSHS) was completed in 2010, yet no action appears to have been taken by USDA on the recommendations from that review. This review was a high priority for states, the findings and recommendations were significant, and implementation of these recommendations could lead to great

improvements in the NSHS. The National Plant Board requests that the NSHS program review recommendations be implemented as soon as practicable and the results reported at the 2014 National Plant Board Annual Meeting.

Sincerely,

A handwritten signature in black ink, appearing to read "Geir Y. Friisoe". The signature is written in a cursive style with a large initial "G".

Geir Y. Friisoe

Cc: Rebecca Bech, Associate Deputy Administrator, USDA-APHIS-PPQ  
Paula Henstridge, Assistant Deputy Administrator, USDA-APHIS-PPQ  
Alan Dowdy, Assistant Deputy Administrator, USDA-APHIS-PPQ  
Mike Watson, Executive Director, USDA-APHIS-PPQ  
Christian Dellis, USDA-APHIS-PPQ  
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