October 3, 2016

Osama El-Lissy,
Deputy Administrator
USDA APHIS PPQ
Washington DC

Dear Osama:

Early detection and delimitation surveys for pests that threaten American agriculture are a shared priority of both USDA APHIS PPQ and the states. The National Plant Board appreciates the support that USDA APHIS PPQ provides in the form of cooperative agreements, survey supplies and technical support.

Recently, states have experienced various difficulties with the survey supply system. In general, states have experienced problems with: quality and correct quantity of traps and lures and timely receipt. For example, some states have conducted their own analysis of gypsy moth pheromone load rate and found it substandard in the last few years. Furthermore, in 2016, gypsy moth lures and supplies were not provided to states until after surveys had begun. States have also experienced problems with timely receipt of lure and trapping supplies for bark beetle and wood borer surveys, as well as with other surveys. Lack of communication from the supplier exacerbates the problem. Furthermore, states have also received trapping supplies with serious quality issues. For example, the parts of the universal moth traps have not fit together properly requiring cooperators to attempt to fix the traps to make them work, requiring significant staff time.

The members of the National Plant Board offer the following suggestions to improve survey supply quality and delivery.

1. Conduct a review of contract terms with survey supply contractors to ensure timely delivery.
2. Hold suppliers accountable to contracted quality standards.
3. Work with survey cooperators to gather feedback on quality and timing issues to continually improve survey supply production and delivery.
4. Review communication protocols for survey supplies to ensure that survey cooperators are immediately notified if any delay in shipments is anticipated.

The National Plant Board is committed to working with USDA APHIS PPQ to improve the quality of our pest surveys to safeguard American agriculture.

Sincerely,

Joe Collins, President
National Plant Board
CC:
Paula Henstridge, Assistant Deputy Administrator, USDA APHIS PPQ
John Bowers, National Survey Coordinator, USDA APHIS PPQ
Lisa Jackson, National Operations Manager, USDA APHIS PPQ
Collin Wamsley, Central Plant Board President
Dana Rhodes, Eastern Plant Board President
Larry Nichols, Southern Plant Board President
Brad White, Western Plant Board President