



# EASTERN PLANT BOARD

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94<sup>th</sup> Annual Meeting  
Portland, Maine  
2019

Osama El-Lissy  
Deputy Administrator  
APHIS PPQ  
Washington DC

April 30, 2019

Dear Mr. El-Lissy,

The USDA APHIS and the Eastern Plant Board states have a shared goal of supporting the needs of exporters. These needs include providing clear guidelines for exporters, as well as ready access to officials qualified to provide phytosanitary certification. The USDA APHIS Strategic Plan (2015-2019) highlights the mission importance of ensuring the safe trade of agricultural products and creating export opportunities for U.S. producers. Memoranda of Understanding (MOUs) between the USDA APHIS and individual states outline the joint and individual responsibilities of state and federal partners in overseeing export activities. Training, certification, and oversight of state Authorized Certification Officials (ACOs) by USDA Export Certification Specialists (ECSs) are critical to the export program goals.

The Eastern Plant Board recognizes the critical role that Export Services provides to its stakeholders, and wanted to highlight some concerns that have recently arisen that could potentially impact exporters. These concerns include: availability of ACO training and re-accreditation resources; and permanently filling open ECS positions to provide support to states.

ACO's are required to be re-accredited every three years in order to maintain their status and ability to provide phytosanitary certification. Currently, the web based re-accreditation program has not been finalized and is unavailable to states. While all ACO's requiring re-certification have had their training dates extended until December 31, 2019, it is critical that sufficient communication occur so that ACOs whose accreditation expires in 2019 are aware of their status and have time to complete and are aware of the availability of training opportunities. Otherwise, there could be fewer ACOs available to certify exports in a state.

In the Eastern Plant Board region, the Export Certification Specialists have been operating on a series of temporary details. The Eastern Plant Board is asking on how many ECSs are currently assigned to the twelve states in the region. EPB states believe large coverage areas, short details, and high turnover in the ECS positions have led to inefficient communication and a loss of continuity in providing support for

states and exporters, with negative results. In the past year, EPB states were informed of an audit by the EU for growers that were listed as Pest Free Places of Production. The audit resulted in two Eastern Plant Board region growers no longer able to export to the EU. Prior to the audit, the states were given very little guidance on what was needed to ensure the growers were in compliance with the Pest Free Place of Production requirements. The states believe that this lack of information about requirements was a contributing factor to the audit's results.

The states believe that a strong partnership with the USDA will be required to address current and future export challenges and to provide program continuity to exporters with minimal disruption. **The Eastern Plant Board respectfully requests that USDA ensure a strong program by providing adequate communication about availability of ACO re-accreditation training, and by permanently filling the Export Certification Specialist positions in the Eastern Plant Board region.**

Sincerely,

Chris Logue, President, Eastern Plant Board

**Distribution:**

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