

## THE CENTRAL PLANT BOARD

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June 15, 2015

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

Dear Osama:

Improved communication and collaboration between the National Plant Board and USDA APHIS PPQ have been a priority for both groups and the focus of mutual effort. While recent efforts, such as the initiation of the “Strategic Alliance” are significant advances, the Central Plant Board is concerned about continued problems in effective and proactive communication.

This spring two high priority surveys, emerald ash borer and gypsy moth, were delayed due to funding uncertainty and glitches with lure delivery. While we understand these problems were unavoidable, the lack of communication was not. More recently, we learned that the Oregon Department of Agriculture tested gypsy moth lure in both 2014 and 2015 and believed the lure strength was below 50%. Even though these findings are still in question, we find it very concerning that neither the National Plant Board nor the Gypsy Moth Slow The Spread Foundation were notified by USDA APHIS PPQ of a possible lure strength issue. This is a high priority pest for all of the Central Plant Board states and clear, open communication is essential to ensure our mutual ability to safeguard our states and the environment from gypsy moth.

When *Ralstonia solanacearum* Race 1 was detected in Maryland and Virginia in December 2014, the National Plant Board members were not notified until approximately January 6. Even then, many states received first notification through their NPDN labs or private nursery entities. It is our understanding that the state plant regulatory officials (SPROs) in Maryland and Virginia were not notified by USDA APHIS PPQ when samples were sent from their states to the national identifier. The CPB much appreciated the *Ralstonia* informational conference call conducted with the states. However, we were very concerned when USDA APHIS PPQ representatives downplayed the importance of Race 1 in northern states, even though some greenhouses in

Central Plant Board states lost thousands of dollars of inventory due to Race 1 infections. Had the states been notified earlier, we may have been able to minimize some of these losses.

A more recent example is the change in federal regulatory status of gladiolus rust. Michigan is the largest producer of gladiolus in the United States. The Michigan SPRO had been in discussion with APHIS about the potential regulatory change for this pest, but had been assured that APHIS would work with them on the timing of any regulatory action so safeguarding measures could be implemented. The Michigan SPRO instead found out about the regulatory change through the public announcement, thereby jeopardizing her relationship with the grower, as well as potentially blind-siding department leadership at a time when the Michigan Agricultural Commission is touring the grower's facility in July. There have been other instances where states have not been given the appropriate opportunity to be a part of the decision-making process, or that USDA APHIS PPQ has acted unilaterally, on issues that greatly impact our states.

Just this week a flag smut conference call was organized by PPQ and the information distributed to the SPHDs. Many Central Plant Board SPROs did not receive notification through their SPHDs, but instead found out the day before the call from other SPROs. Even the Kansas SPRO, who is leading the response to flag smut in Kansas, did not receive confirmation of the call through PPQ, but found out the day before through other SPROs. When the states do not receive timely information from our partners, it not only affects our ability to perform our regulatory and safeguarding duties, but it may also have a real economic impact to the industries and resources we are charged with protecting.

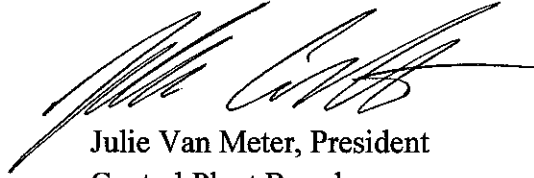
The Central Plant Board asks that additional efforts be made by USDA APHIS PPQ to engage states in decision-making processes on issues that impact states, and not simply notify them when decisions have been made. States will provide a perspective on issues which may not be apparent at the federal level, but which can have a significant impact at the local level. Specifically, we ask that training be provided to key staff (national program and policy managers and leadership staff) on communication protocols with impacted SPROs and the National Plant Board leadership on issues of importance to the states.

Likewise, the National Plant Board will emphasize to new SPROs the importance of close communication with State Plant Health Directors and other USDA APHIS PPQ staff. Furthermore, we will incorporate the topic of communications into the "SPRO 101" training held at the National Plant Board annual meeting.

The Central Plant Board sincerely appreciates the efforts that USDA APHIS PPQ makes to continually evaluate and improve the working relationship it has with the states. We are hopeful however that you recognize there is still work to be done. We are committed to working with

you on implementing these improvements with both USDA APHIS PPQ staff and our own members.

Sincerely,

A handwritten signature in black ink, appearing to read 'Julie Van Meter', written in a cursive style.

Julie Van Meter, President  
Central Plant Board

CC:

Rebecca Bech, Associate Deputy Administrator, USDA-APHIS-PPQ

Mike Watson, Associate Deputy Administrator, USDA-APHIS-PPQ

Paula Henstridge, Assistant Deputy Administrator, USDA-APHIS-PPQ

Geir Friisoe, President, National Plant Board

Dana Rhodes, President, Eastern Plant Board

Mike Evans, President, Southern Plant Board

Brad White, President, Western Plant Board