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

Dear Mr. El-Lissy:

Recently, plant pests have been detected on propagative plant material entering the US. For example, in 2017 the European flower thrips, and in 2019 *Phytophthora ramorum* were found in US nurseries with relationships to Canada. These introductions resulted in significant personnel hours and high costs to mitigate potential damages.

It is our concern propagative plant material entering the US may be cleared using fruits and vegetables regulations, 7 CFR 319.56. Acknowledging there is a clear delineation between the plants and plant parts regulated by 7 CFR 319.37, and 7 CFR 319.56, the expectation is importers of plants intended for planting are subject to 7 CFR 319.37. The entry requirements, inspection requirements, and ability to hold plants with potential plant pests vary between 7 CFR 319.37 and 7 CFR 319.56. If propagative plant material is entering the US using 7 CFR 319.56, it creates an opportunity for plant pest introduction, resulting in economic challenges for states with horticultural economies.

The National Plant Board supports plants for planting being subject to 7 CFR 319.37 regardless of port of entry. The National Plant Board encourages APHIS PPQ to work with the National Plant Board to assess the scope of this issue and identify measures to ensure an adequate inspection, either at the port or at the destination, of imported propagative plant material before it is released into domestic commerce.

Sincerely,

G. John Caravetta
National Plant Board President

Cc:

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Alan Dowdy, Associate Deputy Administrator, USDA APHIS PPQ
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