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

Dear Mr. El-Lissy:

The potential movement of plants pests in cargo is the foundation of plant protection activities. Ensuring adequate attention to cargo pathways safeguards agriculture. The movement of cargo has become increasingly complex and recent developments require an updated risk analysis. Florida and California Border Protection Stations have documented self-movers as a risk for introducing gypsy moth (GM) and Japanese beetle (JB). Inspections of portable moving containers have found gypsy moth egg masses and hundreds of containerized outdoor grown potted plants from Japanese beetle quarantine areas. Although spotted lanternfly (SLF) has not yet been detected at a Florida or California Border Protection Station, data suggest that the risk for an introduction is high with hundreds of shipments arriving from quarantined areas.

Additionally, the movement of goods via air cargo due to the rise of internet sales requires implementation of compliance agreements with air cargo carriers. The number of JB intercepted on cargo aircraft at destinations in California has significantly increased over the past three years from both new and long established companies.

The National Plant Board believes that regulation of self-movers and air cargo is critical to federal and state plant protection activities. The National Plant Board requests that APHIS PPQ evaluate and consider the following:

- Create a joint federal and state task force to evaluate the pathway risk and effectiveness of current safeguarding efforts, particularly related to regulation of Japanese beetle at cargo airports and movement of gypsy moth and other hitch-hiking pests by self-movers.
- Implement an ongoing series of inspection blitzes targeting portable moving storage containers and moving companies on major highways leading to the western US from the SLF, GM, and JB co-infested areas.
- Include container companies in GM compliance agreements.

Sincerely,

G. John Caravetta
National Plant Board President

Cc:

Alan Dowdy, Associate Deputy Administrator, USDA APHIS PPQ
Samantha Simon, Executive Director, USDA APHIS PPQ
Paula Henstridge, Assistant Deputy Administrator, USDA APHIS PPQ
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