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

Dear Mr. El-Lissy:

The National Plant Board appreciates the research power and expertise that the USDA can deploy when analyzing pest risks. The breadth of technical expertise and experience available within the USDA exceeds the capacities of many State Departments of Agriculture. The states utilize Technical Working Group report summaries, risk analyses, and other materials to inform decision making relative to new pest detections, regulatory responses, and pest programs. It is critical to the shared plant health protection responsibilities of both PPQ and the members of the National Plant Board that access to this developed knowledge is available and provided in a timely manner upon request.

States are concerned about potential pest risks from new pest detections that occur in their state, region, and nationally. NAPIS has proven a useful communication device for alerting states to new pest detections, but the accompanying information can be limited. Internal USDA documents like NPAG reports and datasheets may not be publicly available, but they can serve to inform federal and state decision makers. While states can request access to these internal documents, new SPHD and SPRO knowledge about their availability may be limited. The National Plant Board recognizes that there is a process to data gathering and publishing information about new pest interceptions. The National Plant Board supports continuing the current policy of timely release of information about detections, even when only limited information is available. However, the NPB requests that PPQ consider the following:

- 1) Providing additional information in the NAPIS announcements, including the associated host (where available), and the Planting Zone if the pest is found in the environment.
- 2) Maintaining a list of completed Technical Working Group (TWG) report summaries on-line as well as contact information for access to these summaries.

In brief, the National Plant Board appreciates the efforts, scientific expertise, and communication that APHIS provides about new pest detections and regulatory pests. The National Plant Board requests that APHIS ensure that this information is available to all requesting states in a timely manner. The National Plant Board further requests that APHIS consider how to provide the National Plant Board access to TWG and NPAG reports.

Sincerely,

G. John Caravetta
National Plant Board President

Cc:

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