Mr. Joe Collins  
President, National Plant Board  
Department of Entomology  
S-225 Ag. Science Center North  
University of Kentucky  
Lexington, KY 40546-0091

Dear Mr. Collins:

Subject: PPV and PCN Harmonization with the Canadian Food Inspection Agency

We thank you for writing to relay the National Plant Board’s resolution requesting that the United States Department of Agriculture (USDA), Animal and Plant Health Inspection Service (APHIS), Plant Protection and Quarantine (PPQ) work with the Canadian Food Inspection Agency (CFIA) to harmonize regulations and practices for two quarantines pests, plum pox virus and pale cyst nematode.

Plum Pox Virus: We acknowledge that PPV is the most devastating viral disease worldwide of stone fruit and know the importance of eliminating this disease to the North American stone fruit industry. APHIS, State Agriculture Departments, and the U.S. industry share the interest of the NPB in eliminating plum pox virus (PPV) on the Canadian side of the Niagara River before it can spread to affect the adjacent (U.S.) stone fruit production areas in New York State. We also understand concerns raised about a recent report that the Ontario Friends of the Greenbelt Foundation and Ontario Tender Fruit Growers are launching a pilot project to plant up to 130,000 additional tender fruit tree varieties, such as peaches and pears in the Niagara region, as this could increase the risk of re-infection of U.S. eradication zones and/or movement of PPV to previously unaffected areas from Canada.

In December 2011, CFIA initiated a program designed to prevent the spread of PPV outside of the currently regulated area. The program includes a prohibition on propagation of PPV host taxa and movement of regulated material (excluding fresh fruit) from the regulated area. CFIA continues to monitor for PPV in its buffer zone to the south and west of the regulated area, and in five years it has detected only one new PPV positive site on the western edge of the regulated area. One recognized issue for U.S. growers in New York, however, is that the regulated area on the north and east is bordered by Lake Ontario and the Niagara River, with no buffer zone for survey or tree removal. Absent a concerted effort on the Canadian side of the border to remove trees or to plant resistant varieties to lower the titer of PPV in affected orchards, U.S. growers remain at risk of infection from aphid vectors. While CFIA acknowledges our concerns, resources are unavailable to remove infested trees within the quarantine area, and CFIA believes that it would be difficult to convince its industry to initiate another eradication effort.
I would also like to take this opportunity to update you on the status of revisions to NAPPO RSPM 18 (2004), “Guidelines for phytosanitary action following detection of plum pox virus.”

Although earnest efforts were made to define what constitutes management options for possible inclusion in a revised standard, Canada and the U.S. could not reach an agreement as to what constitutes management of PPV for inclusion within the standard. Given that consensus could not be reached, in August 2015, the NAPPO Executive Committee (EC), in lieu of archiving the standard, requested that RSPM 18 instead cite that this standard is applicable to situations where countries would be applying eradication measures. In late October 2015, the revised guidelines were approved by NAPPO. The revised standard’s scope now states:

*These guidelines outline the recommended procedures for delimiting and eradicating Plum Pox Virus (PPV). This standard is applicable to situations where countries would be applying eradication measures. The guidelines also outline procedures for establishing and maintaining a PFA (Pest Free Area), PFPP (Pest Free Places of Production) and PFPS (Pest Free Production Sites) to allow ongoing trade in PPV susceptible plants for planting and propagation. These guidelines do not preclude other requirements (e.g., certification) for the movement of Prunus plants for planting and propagation between countries.*

In summary, the revised standard is fundamentally the same as the existing one with the explanation that this RSPM is applicable when a country is conducting an eradication program.

Beyond NAPPO, the United States will continue to have bilateral discussions and collaborative efforts on the subject. PPQ remains committed to an ongoing dialog with Canada on PPV despite the aforementioned challenges. To that end, U.S. industry representatives and PPQ are pursuing the possibility of a joint industry-PPQ-CFIA meeting to discuss our PPV programs, including planting of non-hosts or resistant hosts in the Greenbelt proposal pilot. We hope that continued communication with Canada and the industry will result in a mutually acceptable harmonization of our programs.

**Potato Cyst Nematode:** Pale cyst nematode (PCN, *Globodera pallida*) was first detected in Idaho in 2006. PPQ, State and Industry cooperators instituted a successful cooperative program against this pest, and the outbreak was confined to a single state and very limited affected area. PPQ recognizes the importance of the PCN program to protect domestic and international trade of potatoes and to preserving the way-of-life for U.S. potato producers.

In 2009, the United States and Canada agreed to “Guidelines on Surveillance and Phytosanitary Actions for the Potato Cyst Nematodes *Globodera rostochiensis* and *Globodera pallida*” that outline the phytosanitary measures to be taken if PCN is detected, provides guidance for management of fields in regulated areas, and establish requirements for movement of seed potatoes and other regulated articles between our two countries. In May 2014, the Guidelines were revised to reflect information gained during the first 5 years of the program. The revisions included a reduction in the amount of soil sampling and testing required to ship seed potatoes between Canada and the United States and adjustments to clarify the process for releasing
regulated agricultural land and for deregulating fields that are no longer used for agriculture. The NPB and industry participated in development of the Guidelines and the subsequent revision. CFIA is enforcing the current guidelines for Canadian growers and there are no attempts to change the current PCN agreement.

We believe the comments from the NPB may rather be reflecting some confusion with an initiative from CFIA in 2012 regarding the Seed Potato Tuber Quality Management Plan (SPTQMP). Canada’s Plan would allow seed potato growers or their representatives to conduct inspections for shipments exported to the United States. In August 2014, following discussions with APHIS, CFIA agreed to discontinue this program for potatoes exported to the U.S., and CFIA continues to conduct shipping point inspections pending an agreement with APHIS on a mutually agreeable alternative. CFIA agreed to include the U.S. in a working group to consider any future alternatives and we are ready to participate once this working group is formed. We hope this clears up any confusion about our interactions with CFIA with respect to quarantine pest programs such as PCN and quality pest initiatives such as the SPTQMP.

Thank you again for relaying the resolution. If you have any further concerns about our PPV or PCN programs please call me at 202-700-7163. You may also call Lynn Evans-Goldner at 301-851-2286 (PPV), Jonathan Jones at 301-851-2128 (PCN), or Terri Dunahay at 301-851-2369 (U.S.-Canadian trade).

Sincerely,

Osama El-Lissy
Deputy Administrator
Plant Protection and Quarantine

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