



November 4, 2016

Animal and Plant
Health Inspection
Service

Plant Protection and
Quarantine

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Mr. Joe Collins
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Dear Mr. Collins:

Subject: National Plant Board letter on pest survey supply quality and delivery

Thank you for writing to me to express the National Plant Board's concerns about survey supplies from Plant Protection and Quarantine. The information you provided assists us in our continued effort to provide quality and timely survey supplies.

According to your letter, some states have analyzed the pheromone load rate of gypsy moth lures and found it substandard in the last few years. PPQ works hard to ensure that the lures we provide are of the highest quality and we believe that the lures distributed in 2016 met expected performance. The PPQ Otis lab tested the gypsy moth string lure prior to distribution this May. These tests found an acceptable range of pheromone (0.5mg +/- 10%). In addition, the vendor who produces the lures tests the load rate and certified the lures were loaded correctly.

The Oregon Department of Agriculture alerted PPQ that their own lure analyses performed on June 29 revealed substandard pheromone load rates. On October 5, the PPQ Otis lab completed their tests of lures from the same lot analyzed by Oregon Department of Agriculture and found results consistent with its previous tests. It is unclear at this stage why the analyses of the Otis and Oregon labs differ in the amounts of active ingredient, since both labs use the same method of analysis. The Otis lab would like to consult with the Oregon Department of Agriculture and any other NPB members that have concerns to resolve discrepancies in the results.

Despite our best intentions, some instances have arisen in which various factors resulted in unintentional shipping delays for survey supplies. The procurement of lures was limited by several continuing resolutions in fiscal year 2016 (FY16). We purchased the maximum number of lures possible with the initial funding provided in December 2015; however, that purchase did not cover the entire supply needed for FY16. When the final

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budget was received, PPQ immediately purchased the balance of FY16 lures. It is important to understand that vendor delays in production did not contribute to this issue.

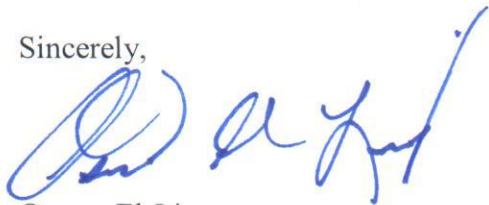
We are working diligently to improve the survey supply system. To support timely distribution of survey supplies, PPQ purchased the pheromone used to produce gypsy moth lures and additional tree and wood pest lures. PPQ invested over \$500,000 to stock survey supplies in the warehouse this year and purchased a 3,840 ft³ freezer, which will double the space available for lure storage. To overcome the difficulties we experienced last year, PPQ has committed to purchase as much gypsy moth string lure as possible early in the season, increase communication to NPB about delays in shipping and procurement, and hire appropriate staff to support survey supplies.

Additionally, we are working to improve communication protocols for survey supplies. PPQ communicates the delivery status of lures by sending a system message through the Integrated Plant Health Information System (IPHIS) at two key stages in the delivery process: when the order is approved and when the order is shipped. We are already working with a developer to make changes to shipping emails to display current shipments and back-ordered quantities and to make information found on the "My Orders" screen available to all approvers in the state. We hope to have these improvements implemented by late November.

The Survey Supply and Procurement Program staff and members of PPQ leadership met at the end of October to review the communication plan for survey supplies, decide the best way to proceed, and develop a plan to ensure all necessary survey supplies for each PPQ program are in place or ordered well in advance of each survey season. As a result, PPQ will be better able to communicate to the NPB about the status of survey supplies.

I believe that with these changes, PPQ will provide enhanced customer service to NPB for the survey supply system. PPQ is committed to working with the National Plant Board to continue to improve program delivery and communication.

Sincerely,



Osama El-Lissy

Deputy Administrator

Plant Protection and Quarantine