



Southern Plant Board

President, Gene Cross, North Carolina (919) 733-3933
Vice President, Sancho Dickinson, Oklahoma (405) 522-5879
Secretary-Treasurer, Harry Fulton, Mississippi (662) 325-7765

Contact Address: Plant Industry Division
North Carolina Department of Agriculture & Consumer Services
1060 Mail Service Center
Raleigh, NC 27699-1060

May 19, 2009

Ms. Rebecca Bech
Deputy Administrator for Plant Protection and Quarantine
USDA, APHIS, PPQ
Jamie L. Whitten Federal Building
14th Street and Independence Avenue, SW
Room 301-E
Washington, DC 20250

Dear Rebecca:

On behalf of the membership of the Southern Plant Board (SPB), I am writing to make you aware of our membership's concerns related to the enforcement of Solid Wood Packing Material (SWPM) regulations. Specifically, SPB member states are requesting that USDA, APHIS, PPQ work jointly with the states and Customs and Border Protection (CBP) to prevent the introduction of serious wood pests such as Asian longhorned beetle, emerald ash borer and other insect pests into our states. As a part of this protection, we are requesting for CBP work to identify serious violators and fraudulently-marked SWPM in order to preclude serious pests from entering the U.S. Finally, it is our hope there is cooperation among the federal partners in order to ensure the tools and technical resources are available to identify high risk SWPM. It is urgent that USDA, APHIS, PPQ and Customs & Border Protection (CBP) work together to strengthen the SWPM compliance policies.

The introduction of wood pests such as Asian longhorned beetle, emerald ash borer, and other serious wood pests would be devastating to our Southern timber and nursery industry, as well as our native forests, urban landscapes, and homeowners. Our SPB membership continues to monitor our neighboring states and Canada closely reviewing the status of repeat introductions and spread. It has been noted in recent news articles, the Government of Canada has placed additional restrictions on SWPM from China. Canada cited continuing problems with International Plant Protection Convention marked SWPM that was found to have live pests. It should be noted, the refusal of non-compliant shipments has not created the sufficient incentive needed for the trade community to fully comply with 7 CFR 319.40 regulations. As such, there is a need to prohibit or increase restrictions on SWPM products from countries with high violation rates and to impose stronger penalties against the violators to prevent further violations.

Member States

Alabama – Arkansas – Florida – Georgia – Kentucky – Louisiana – Mississippi
North Carolina – Oklahoma – Puerto Rico – South Carolina – Tennessee – Texas – Virginia

Ms. Rebecca Bech
May 19, 2009
Page 2

To address the concerns of the SPB, the following recommendations are provided for your review and consideration:

1. The SPB recommends that a thorough review of the SWPM Program be conducted, specifically to identify the weak links in the system and to take corrective measures to reduce the overall pest risk.
2. The SPB recommends that current policies be revised in order to target high risk SWPM for inspection and to issue penalties and increase deterrents for SWPM violations.
3. The SPB recommends that SWPM be prohibited from countries with high levels of fraudulent stamp use, pest infestations, and other similar violations.
4. The SPB recommends that prohibitions, additional treatments, or bans be placed on SWPM from any country that has been issued numerous violations until it can be verified the problem has been corrected.

If I can provide additional background regarding this issue, please do not hesitate to let me know. The SPB membership remains willing to work cooperatively with the federal agencies and member states to effectively address this critical issue.

Sincerely,

Gene Cross
President

c: Thomas Winkowski
Kevin Harriger
Gray Haun