November 20, 2015

Osama El-Lissy
Deputy Administrator for Plant Protection and Quarantine
USDA APHIS PPQ
Jamie L. Whitten Federal Building
1400 Independence Avenue, SW
Washington, DC 20250

Re: Phytosanitary Programs for the Seed Industry

Dear Osama:

The United States is the largest market for seeds in the world with a value of $12 billion. The importance of seed movement in a global market is increasingly complex and valuable. However, there have been a number of pest risk incidents involving seeds such as: cucumber mottle mosaic virus, wheat blast, late wilt and mildew, foreign viruses and viroids.

USDA APHIS PPQ has been meeting on a regular basis with the American Seed Trade Association (ASTA) to develop new approaches to phytosanitary management in the seed industry. Individual states have unique state seed laws in place that regulate and certify the sale and distribution of seed as well as being the primary entity responsible for export certification. It is also the states that have the primary regulatory authority to exclude, contain, eradicate or manage plant pests that threaten state agriculture or the environment.

With this in mind, the National Plant Board requests that APHIS PPQ more fully engage and partner with the states in discussions or planning events regarding the development of any regulatory programs or strategies to managed pest risks posed by the interstate and international movement of seed.

Sincerely,

Joe Collins, President
National Plant Board

CC:
Matt Royer, Associate Deputy Administrator, USDA-APHIS-PPQ
Paula Henridge, Assistant Deputy Administrator, USDA-APHIS-PPQ
Ric Dunkle, ASTA
Regional Plant Board Presidents