

**American Forest Foundation  
American Nursery & Landscape Association  
California Forest Pest Council  
City of Milwaukee  
Cornell University, Department of Natural Resources  
The Davey Institute  
Greenspace-the Cambria Land Trust  
International Maple Syrup Institute  
Massachusetts Association of Campground Owners  
Monrovia Nursery  
National Association of State Foresters  
National Plant Board  
The Nature Conservancy  
North American Maple Syrup Council, Inc.  
Society of American Florists  
Society of American Foresters  
Society of Municipal Arborists  
Virginia Native Plant Society**

December 19, 2011

Ms. Rebecca Bech  
Deputy Administrator  
US Department of Agriculture  
Plant Protection and Quarantine  
Animal and Plant Health Inspection Service  
Whitten Building, Room 302-E  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Ms. Bech,

We are writing to express our concern that tree-killing pests continue to enter the country in wood packaging, five years after the United States reached full implementation of the International Standard for Phytosanitary Measures (ISPM) No. 15.

Detection data, cited by several authors, demonstrate that introductions of insects that feed on phloem or wood have increased markedly in recent years. For example, of the 58 exotic scolytines established in the United States, 21% were first collected during the period 2000-2010.<sup>1</sup> U.S. inspectors intercepted five Asian longhorned beetles (ALB) in 2008 – probably in wood packaging.<sup>2</sup> A study in which a small sample of imported wood pallets collected in 2008-2009 was taken apart and examined closely found evidence of insect activity.<sup>3</sup>

The proportion of wood packaging that is determined, through port inspections, to harbor live insects appears to be quite low – 0.1% in the United States, according to one study.<sup>4</sup> Nevertheless, there is reason for concern. First, for a variety of reasons, data collection practices do not allow determination of the true approach rate of insects in the wood packaging pathway.<sup>5</sup> Second, given the high costs associated with introduced wood borers,<sup>6</sup> any risk of additional introductions is cause for concern. According to calculations by Schortemeyer et al. (2011), under a worst-case scenario, a single shipping container from China could transport up to 396 ALB or 1,672 emerald ash borers (EAB). Assuming that a new pest population could become established from a single pair, any quarantine treatment should allow for no more than one survivor per container – a treatment efficacy of 99.75% for ALB and 99.94% for EAB.<sup>7</sup> As you know, six separate introductions of ALB have been detected in the United States; more than \$373 million has been spent trying to eradicate these outbreaks.<sup>8</sup>

It is widely agreed that the continued presence of pests in wood packaging could be a result of improper application of the treatment, pest tolerance to the treatment, infestation after treatment, or fraud.<sup>9</sup>

Several of us have already written to you to express our support for studies now under way to resolve questions about the efficacy of the treatments prescribed by ISPM No. 15.

In the meantime, however, we are concerned that insufficiently rigorous enforcement might be creating an incentive for importers to ignore the standard's requirements. According to Kevin Harriger, Custom and Border Protection's acting executive director of agriculture programs, over the past three years approximately three-quarters of shipments found to be non-compliant with ISPM No. 15 fail because the wood packaging lacks the ISPM No.15 stamp. It is our understanding that these shipments are denied entry, but that no further penalty is imposed unless the importer has a record of four or five additional instances of noncompliance. It is our further understanding that this number of allowances applies to a year – that is the importer starts each new year with a “clean slate.”

We would like to meet with you to discuss ways to enhance enforcement of phytosanitary regulations, particularly those that apply to wood packaging. Our request is prompted by a series of interrelated events:

- Congressional consideration of S. 1673, a bill intended to improve the agricultural inspection process.
- Publication of the APHIS Strategic Plan, which reports that in 2009, the agency became aware of 58 new or re-introduced plant pests.
- Publication of the study by Aukema and others (full reference below) documenting the very high economic costs associated with wood boring insects that are transported in wood packaging.
- Continued spread of EAB, ALB, and redbay ambrosia beetle – demonstrating the extreme difficulty in containing these pests.

- Current and anticipated cuts in funding to pest containment programs, in particular those that target wood borers.

We look forward to discussing with you ways we can work together to enhance programs aimed at preventing introductions of damaging plant pests. If you have any questions about our comments or wish to speak to us directly, please contact Faith Campbell at 703-841-4881 or [fcampbell@tnc.org](mailto:fcampbell@tnc.org).

Yours,

Robert L. Bendick, Director, Government Relations, The Nature Conservancy

Michael E. Cooper, President, National Plant Board

Jay Farrell, Executive Director, National Association of State Foresters

Marcia Galvin, Executive Director, Massachusetts Association of Campground Owners

Michael T. Georgen, Jr., Executive Vice President and CEO, Society of American Foresters

Ricahrd Hawley, Executive Director, Greenspace-the Cambria Land Trust

Jerri J. LaHaie, Exeuctive Director, Society of Municipal Arborists

Mary Ann Lawler, Conservation Chair, Virginia Native Plant Society

Jerry Lee, Environmental Services Manager, Monrovia Nursery

Tom Martin, President and CEO, American Forest Foundation

Richard Norman, President, International Maple Syrup Institute

Anand B. Persad, Regional Technical Advisor, The Davey Institute

Cécile Brassard Pichette, President, North American Maple Syrup Council, Inc.

Craig J. Regelbrugge, Vice President, Government Relations, American Nursery & Landscape Association

Bob Rynearson, Chairperson, California Forest Pest Council

David B. Savyer, Forestry Services Manager, City of Milwaukee

Lin Schmale, Senior Director, Government Relations, Society of American Florists

Mark C. Whitmore, Forest Entomologist and Extension Associate, Cornell University, Department of Natural Resources

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- <sup>1</sup> Aukema, J.E., D.G. McCullough, B. Von Holle, A.M. Liebhold, K. Britton, & S.J. Frankel. 2010. Historical Accumulation of NIS Forest Pests in the Continental United States. *Bioscience*. December 2010 / Vol. 60 No. 11; Haack RA, Rabaglia RJ (2011) Exotic bark and ambrosia beetles (Coleoptera: Curculionidae: Scolytinae) in the US: potential and current invaders. In Peña JE (ed.) Potential invasive pests of agricultural crop species. CAB International, Wallingford, UK. (In press)
- <sup>2</sup> Haack, R.A., F. H'érard, J. Sun, and J.J. Turgeon. 2009. Managing Invasive Populations of Asian Longhorned Beetle and Citrus Longhorned Beetle: A Worldwide Perspective. *Annu. Rev. Entomol.* 2010. 55:521–46
- <sup>3</sup> Persad, A. 2010. A Localized Survey of Solid Wood Packaging and Insect Activity Pre and Post ISPM15. Continental Dialogue on Non-native Forest Insects and Diseases, Annual Meeting, XX Massachusetts, October 2010.
- <sup>4</sup> Haack RA, RJ Rabaglia. 2011. Exotic bark and ambrosia beetles (Coleoptera: Curculionidae: Scolytinae) in the US: potential and current invaders. In Peña JE (ed.) Potential invasive pests of agricultural crop species. CAB International, Wallingford, UK. (In press)
- <sup>5</sup> Auclair, A. 2009. (USDA APHIS internal study) Interception of Pests on SWPM at US Ports-of-Entry 12 February 2009; revised 13 February 2009; R. Haack, pers. comm. to Faith Campbell, June 2011
- <sup>6</sup> Aukema, J.E, B. Leung, K. Kovacs, C. Chivers, K.O. Britton, J. Englin, S.J. Frankel, R.G. Haight, T.P. Holmes, A. Liebhold<sup>1</sup>, D.G. McCullough, B. Von Holle 2011. Economic Impacts of Non-Native Forest Insects in the Continental US. *PLoS-One* September 2011 (Volume 6, Issue 9).
- <sup>7</sup> Schortemeyer, M., K. Thomas, R.A. Haack, A. Uzunovic, K. Hoover, J.A. Simpson, and C.A. Grgurinovic. 2011. FORUM Appropriateness of Probit-9 in the Development of Quarantine Treatments for Timber and Timber Commodities. *J. Econ. Entomol.* 104(3): 717-731 (2011).
- <sup>8</sup> Haack, R.A., F. H'érard, J. Sun, and J.J. Turgeon. 2009. Managing Invasive Populations of Asian Longhorned Beetle and Citrus Longhorned Beetle: A Worldwide Perspective. *Annu. Rev. Entomol.* 2010. 55:521–46
- <sup>9</sup> Haack RA, RJ Rabaglia. 2011. Exotic bark and ambrosia beetles (Coleoptera: Curculionidae: Scolytinae) in the US: potential and current invaders. In Peña JE (ed.) Potential invasive pests of agricultural crop species. CAB International, Wallingford, UK. (In press); A. Auclair. 2009. (USDA APHIS internal study) Interception of Pests on SWPM at US Ports-of-Entry 12 February 2009; revised 13 February 2009; Haack, R.A., F. H'érard, J. Sun, and J.J. Turgeon. 2009. Managing Invasive Populations of Asian Longhorned Beetle and Citrus Longhorned Beetle: A Worldwide Perspective. *Annu. Rev. Entomol.* 2010. 55:521–46