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. U.S. inspectors intercepted five Asian longhorned beetles (ALB) in 2008 – probably in wood packaging. 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.
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. Moreover, 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. Second, given the high costs associated with introduced wood borers, 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. 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.

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.

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.

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
Richard Hawley, Executive Director, Greenspace-the Cambria Land Trust
Jerri J. LaHaie, Executive 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
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