

**Alliance for Community Trees
American Forest & Paper Association
American Nursery & Landscape Association
City of Chicago Department of Streets and Sanitation Bureau of Forestry
The Davey Institute of Tree Sciences
Florida Nursery, Growers & Landscape Association
Mulch & Soil Council
National Association of State Foresters
National Plant Board
National Wooden Pallet and Container Association
The Ohio State University, Department of Entomology
The Scotts Miracle-Gro Company
Society of American Florists
Society of American Foresters
The Nature Conservancy
University of Georgia, Center for Invasive Species & Ecosystem Health**

Thursday, June 12, 2008

The Honorable Edward T. Schafer
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Dear Secretary Schafer:

We are writing to you on the significant issue of domestic spread of wood-related invasive pests. Our groups have come together with many others under the auspices of the Continental Dialogue on Non-Native Forest Insects and Diseases. The Continental Dialogue is a collaboration of diverse interests aimed at addressing the threat of non-native insects and diseases on America's forests.

Across the nation pests like the Emerald Ash Borer (EAB), the Pine Shoot beetle, the Sirex woodwasp, and the Asian longhorned beetle, are ravaging forests. The onslaught from these foreign invaders seems endless, with at least 20 other foreign invasive pests being monitored as potential threats. The introductions of these pests into North America are consequences of our global economy. One entry pathway into the U.S. is contaminated solid wood packaging. Additionally, once they become established they may be transported from their initial infestation locations to other domestic locations by various means including untreated solid wood packaging. The spread of these pest species within the U.S. via solid wood packaging is not being adequately addressed.

The undersigned organizations would like to offer our support for adopting the ISPM 15 international standard for solid wood packaging as a U.S.-wide standard for domestic solid wood packaging and pallets as a proactive approach to limiting the domestic spread of these pests. Further, we urge that ISPM 15 wood pallet and container treatment requirements be implemented as a U.S.-wide domestic standard within the next 24 months.

Adoption and implementation of the international standard (ISPM 15) for solid wood packaging is just an initial step toward solving a complex problem. There are other troublesome pathways for

these pests that will require our continued collective search for solutions. However, expanding the international standard to application for domestic use will help to mitigate solid wood packaging as a pathway and allow us to focus our time and resources toward resolving concerns for other pathways.

Assistant Deputy Administrator David Kaplan, APHIS PPQ, has been instrumental in bringing together diverse stakeholders to craft a solution that will be workable and effective. Through his efforts working with industry, environmentalists and government scientists, Dr. Kaplan has inspired enthusiastic buy in from those involved.

Recently, the National Wooden Pallet and Container Association (NWPCA) strongly urged APHIS to establish a nationwide wooden pallet and container treatment requirement consistent with the ISPM 15 international requirement. The Mulch & Soil Council (MSC) also supports establishment of ISPM 15 as a domestic standard. While the proposals differ in phase-in approaches, there is broad agreement that national domestic wood pallet and container treatment requirements must be implemented – and soon.

USDA already has in place a paperless system to facilitate compliance for solid wood packaging destined for export. The agency's system includes treatment and marking of new and repaired wood pallets and containers, random inspections by authorized lumber inspection companies, audits of inspection agencies by the American Lumber Standards Committee (heat treatment) and NWPCA (fumigation) and enforcement by USDA. This program is paid for by wood packaging manufacturers, and is monitored by designees of the USDA who maintains ultimate oversight authority. Monitoring of the international solid wood packaging treatment program has shown an encouraging level of efficacy to date.

Our organizations urge the USDA to begin the rule-making process immediately to help in stemming the movement of invasive species and protecting America's forests.

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