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June 30, 2011

Diane L. Schuble  
National Coordinator for Official Control –  
The Federally Recognized State Managed Phytosanitary Program  
USDA APHIS PPQ  
4700 River Road  
Riverdale, MD 20737

Dear Ms. Schuble:

The National Plant Board has reviewed the proposal put forth by your agency to change the status of the following insect and plant disease pests currently regulated in foreign trade to non-actionable at ports of entry:

- *Dialeurodes schefflerae* Hodges & Dooley
- *Elixothrips brevisetis*
- *Neohydatothrips burungae* (Hood)
- *Oecophora bractella* (L.)
- *Tetraleurodes perseae* Nakahara
- *Rhyparochromus (Xanthochilus) saturnius*
- *Uredo dianellae* Dietel

Based on responses received from our members the National Plant Board concurs with those recommendations.

The State of Oregon has indicated specific comments and concerns on *Tetraleurodes perseae*, and *Rhyparochromus (Xanthochilus) saturniu*. The state of Oregon recommends these two remain regulated in foreign trade. I have attached the State of Oregon comments for your reference.

The National Plant Board looks forward to continued close cooperation with USDA APHIS PPQ to improve the safeguarding the agricultural and horticultural resources of other states, and appreciates the opportunity to provide comments on the potential de-regulation of plant pests of mutual concern.

Sincerely,

A handwritten signature in black ink that reads 'Carl P. Schulze, Jr.' The signature is written in a cursive style.

Carl P. Schulze, Jr.  
President

Cc: Alan Green, USDA APHIS PPQ Plant Health  
Aurelio Posadas, Executive Secretary

Attachment

## ATTACHMENT

From: Helmuth Rogg [mailto:hrogg@oda.state.or.us]  
Sent: Friday, June 17, 2011 10:03 AM  
To: Rise, Donna  
Cc: Dan Hilburn; Brad (AGR) White; huhden@state.wy.us; jcaravetta@azda.gov; Lyle.Wong@hawaii.gov; Robert Leavitt; blewis@nmda.nmsu.edu; Jeff Knight (NV); Mike Cooper; Mitchell Yergert

Subject: DEEP comments from ODA

Dear Donna,

Dan asked me to provide comments on the DEEP reports. Jim LaBonte and I revised the DEEP reports for the following species:

1. *Rhyparochromus saturnius*
2. *Tetraleurodes perseae*
3. *Dialeurodes schefflerae*
4. *Elixothrips brevisetis*
5. *Neohydatothrips burungae*
6. *Oecophora bractella*

In general, we support a cautionary approach when deciding on de-regulation. This applies specifically to species 1 and 2. The fact that we do not know much about a species or that the species is established should not automatically qualify the species for de-regulation. Actually, the opposite should be the case. Some of the DEEP reports have inconsistent argumentations, such as ... "the species is reported as a pest (*Elixothrips brevisetis*), although it is not known to cause significant damage"... The reports contain some important errors or come to an inconsistent conclusion.

Here are our specific comments:

### 1. *Rhyparochromus saturnius*:

This species should not be de-regulated. The fact that there is little information available should not qualify this species for de-regulation. There are many recent examples where a species was prematurely de-regulated, such as brown marmorated stink bug, Asian longhorned beetle, Swede midge. Yes, the species is established but to our knowledge it is still limited to a restricted area. It can be very abundant in grass seed fields in southern Oregon indicating that it does feed on grass seed. It is reported from CA as well. In addition, the interception report indicates that ceramic tiles should be fumigated as it is the main pathway for this species. So, how much else comes in on ceramic tiles?

### 2. *Tetraleurodes perseae*:

This species should not be de-regulated. It has a limited distribution and the pathway can be regulated and enforced. An EPPO report indicates that Mexico is using parasitoids to control this whitefly, which would indicate that it is considered a significant enough pest to invest in biocontrol efforts. One of the host plants, *Umbellularia californica*, is a native plant, so there is an unknown ecological impact that needs to be considered.

### 3. *Dialeurodes schefflerae*:

This species may be de-regulated. However, the DEEP report seems to come to inconsistent conclusions on the pest status, indicating that the report would require more research.

## ATTACHMENT

### 4. *Elixothrips brevisetis*:

This species may be de-regulated.

### 5. *Neohydatothrips burungae*:

This species may be de-regulated. Interestingly enough, the DEEP report mentions that another exotic species, *Scirtothrips perseae* may suppress *N. burungae*. So, what is the conclusion?

### 6. *Oecophora bractella*:

This species may be de-regulated. However, this DEEP report is missing fundamental primary literature information indicating that the report would require more research.

Thank you and best regards,

Helmuth

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