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September 5, 2013

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

Re: DEEP List due August 30, 2013

Dear Ms. Schuble:

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

- Dieuches armatipes, African seed bug
- Hemicycliophora typica, a nematode with no common name
- Hypogeococcus pungens, a mealybug with no common name
- Opuntiaspis carinata, Keeled mytilaspis
- Ovachlamys fulgens, Jumping snail
- Palmicultor palmarum, Ehrhorn's palm mealybug
- Parapoynx diminutalis, Asian Hydrilla moth
- Phorodon humuli, Damson-hop aphid
- Singhiella simplex, Fig whitefly
- Siphanta acuta, Torpedo bug

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

However, the states of California and Oregon did have some concerns. California will likely petition two of these pests. And they also had a comment on one pest report. Oregon dis agrees with the deregulation of three of the pests. Please see Attachments for California and Oregon comments.

The National Plant Board looks forward to continued close cooperation with USDA APHIS PPQ to improve the safeguarding of the agricultural and

horticultural resources of states, and appreciates the opportunity to provide comments on the potential de-regulation of plant pests of mutual concern.

Sincerely,

Geir Y. Friisoe, President
National Plant Board

cc: Alan Dowdy, USDA APHIS PPQ
Aurelio Posadas, Executive Secretary
NPB Board of Directors

California Comments on August 30, 2013 DEEP List

Dieuches armatipes (Walker): African seed bug

Native to Africa, African seed bug has been in Florida since 1992. This is a pest of harvested peanuts that is now largely managed by modern harvest and storage procedures. It is also known to feed on other seeds but has never been documented as having any economic or environmental impact. CDFA concurs with the deregulation of *D. armatipes*.

Hemicycliophora typica de Man

CDFA concurs with APHIS' consideration to deregulate this nematode species for the reasons given in the report, with one exception (given below). *H. typica*, (a sheath nematode – one of many sheath nematodes within the genus) has been known internationally for several decades, and in the USA for over 50 years. It has not been reported from California – but given its association with a vast number of agricultural and non-agricultural plants, and wide distribution, its presence in California is a possibility. However, there no reports of its economic damage or losses caused on crops, even though it has been found associated with several plant families. Demonstrations have been reported of its feeding on rice seedling roots causing slight swellings (Bleve Zacheo, 1987) but there are no further reports of its causing economic damage to rice or any other crop.

The exception referenced above is reason # 3 given under "Deregulation conclusion", which states, "(*Hemicycliophora typica*) has the potential to spread regardless of regulation since it can move via human mediated mechanisms". Indeed this nematode species as also several other species of nematodes or other types of pests, may have the potential to rapidly spread through human mechanisms, but it is because of this potential, plus the potential to cause economic damage especially to high value crops and environments that makes regulations all the more invaluable. Therefore, the phrase "regardless of regulation" is inappropriate, and the omission of reason #3 from the conclusion is suggested.

Hypogeococcus pungens: Harrisia cactus mealybug

Harrisia cactus mealybug is native to South America but has colonized Florida and Puerto Rico. In Florida it does not cause significant damage, but it Puerto Rico it has caused significant damage to native cacti. The mealybug feeds on columnar cacti where it interrupts flowering and fruiting. It is so effective at disrupting the life cycle of cacti that it has been used in successful biological control programs against cacti in both Australia and South Africa. There are more than 500 species of columnar cacti native to North America that should be considered potential hosts of this mealybug. These cacti are the foundation of many desert ecosystems where they sustain vertebrate and invertebrate biodiversity. Furthermore, cacti are very popular in the nursery industry. Due to the potential environmental threat that *H. pungens* poses to native desert ecosystems and potential economic damage to the nursery industry CDFA recommends against deregulation of this mealybug. California will likely petition to add *H. pungens* to the FRSMP program.

Opuntiaspis carinata (Cockerell): Keeled mytilaspis

Keeled mytilaspis is a polyphagous armored scale native to Mexico and Central America that has established in Florida and Texas. Although it is not considered an economic or environmental pest in those states, Keeled mytilaspis is listed as a quarantine pest in many countries including New Zealand (http://www.biosecurity.govt.nz/imports/plants/standards/cordyline-dracaena.htm), China (http://pflanzengesundheit.jki.bund.de/dokumente/upload/0aec6_tw3-pqanf2012.pdf), and Korea (http://pflanzengesundheit.jki.bund.de/dokumente/upload/2b429_kr3-2011qso.pdf). If deregulated, keeled mytilaspis is likely to enter California on plants for planting from Mexico and establish in the state. Furthermore, Dehesa nolina (*Nolina interrata*) is listed on California's endangered plant list and is a potential host that could be directly affected by the scale. However, the limited mobility of female scale insects may limit the chance of exposure. As the potential exists for this scale to negatively affect exports and an endangered species, California may petition to add *O. carinata* to FRSMP in the future.

Ovachlamys fulgens (Gude): Jumping snail

Jumping snail is a widespread tropical snail that is present in Florida and Hawaii but is not known to be present in California. The snail primarily feeds on decaying vegetation but is noted in at least one source as a pest of orchids, other horticultural plants, and avocado. Jumping snail is frequently intercepted in trade of plants for propagation, cut flowers, and greenery material, indicating that it may be of some concern to these industries. California has no comment on the deregulation of *O. fulgens*.

Palmicultor palmarum (Ehrhorn): Ehrhorn's palm mealybug

Ehrhorn's palm mealybug feeds on a variety of palms and other tropical plants and is known to be in Florida and Hawaii as well as most of the warmer parts of the world. It is relatively commonly intercepted on shipments of flowers and plants coming into California from both Hawaii and Florida. Despite having a widespread distribution, it is not known to be considered a serious pest anywhere it is found. Nor is it known to be listed as a quarantine pest anywhere it is found. It is not expected to impact any threatened or endangered species in California but its presence could trigger an increased use of pesticides in some ornamental plantings. CDFA concurs with the deregulation of *P. palmarum*.

Parapoynx diminutalis Snellen: Asian Hydrilla moth

Asian Hydrilla moth is native to Pakistan and Southeast Asia where it feeds primarily on *Hydrilla*, a noxious weed in California. The moth is also occasionally found on other aquatic plants. In the laboratory it was able to feed on *Polygonum* sp., which could put the federally and state endangered Scott's Valley Polygonum (*Polygonum hickmanii*) at risk. However, the moth has not been documented feeding on any plants in the genus *Polygonum* in the wild. The moth is not known to be included on any quarantine lists. Asian Hydrilla moth is not expected to have a significant economic or environmental impact on California. CDFA concurs with the deregulation of *P. diminutalis*.

Phorodon humuli (Scrank): Damson-hop aphid

Damson-hop aphid is a C-rated pest of hops and *Prunus* that has been established in California for nearly a century and is not under any official control. CDFA concurs with the deregulation of *P. humuli*.

Singhiella simplex (Singh): Ficus whitefly

S. simplex (Ficus whitefly) has established large populations in Los Angeles and San Diego Counties of California and is not under any official control. Contrary to the DEEP report, hosts of the whitely including *Ficus benjamina* are abundant in California. The source cited for plant distributions in this report does not yet have complete data for California and is at present unreliable as a sole source of data. CDFA concurs with the deregulation of *S. simplex*.

Siphanta acuta (Walker): Torpedo Bug

Torpedo Bug is a C-rated polyphagous pest that has been established in California for over 30 years and is not under any official control. CDFA concurs with the deregulation of *S. acuta*.

Oregon Department of Agriculture Comments on DEEP (August 30, 2013) Reports and Recommendations for:
Dieuches armatipes, Hemicycliophora typica, Hypogeococcus pungens, Opuntiaspis carinata, Ovachlamys fulgens, Palmicultor palmarum, Paraponyx diminutalis, Phorodon humuli, Singhiella simplex,* and *Siphanta acuta.

Oregon agrees with the recommendations in the DEEP reports regarding *Dieuches armatipes, Opuntiaspis carinata, Ovachlamys fulgens, Palmicultor palmarum, Paraponyx diminutalis, Phorodon humuli,* and *Siphanta acuta.* We disagree with the recommendations for *Hemicycliophora typica, Hypogeococcus pungens,* and , *Singhiella simplex*.

Hemicycliophora typica
This nematode is a known pest of carrots. Oregon provides most of the carrot seed for the world and carrots per se are a significant crop throughout much of Oregon. This species is unknown from Oregon. Given its potential as a pest of an important crop it should remain reportable/actionable.

Hypogeococcus pungens
This pest should not be deregulated. There is no evidence provided that natural enemies are currently suppressing or are capable of suppressing this pest and it is not widely established where most of its host plants occur, let alone those which it likely to attack. Because of the latter concern, it is a severe ecological threat to the southwestern United States, to landscape plantings therein, and poses a threat to nurseries producing cacti and other hosts. Deregulating this pest would also increase dissemination throughout vulnerable areas, especially via human movement in ornamental plants.

The widespread distribution of generalist mealybug predators and parasitoids across Florida is not evidence of biological control. Stating that it is "likely" such is occurring is not evidence thereof. Biological control does not limit natural spread (which is not the greatest concern – human distribution is) – it limits abundance. Even if control is occurring in Florida, this is irrelevant to areas where these agents are absent or cannot thrive. Even if these or similar agents are present in California there is no guarantee that they will be effective against this species and or that they will flourish in the areas it will invade. "Not unreasonable to suggest…affected by natural enemies" – true, but meaningless. "Affected" is not equivalent to "effectively controlled".

Despite citing Zimmerman et al. 2010, many host plants mentioned therein were not listed as hosts: Cactoideae: *Cleistocactus*, *Echinopsis*, *Leptocereus quadricostatus, Melocactus intortus, Monvilea,* and *Stenocereus fimbriatus*. Euphorbiaceae: *Acalypha*. This information is critical to assessing host breadth and potential for attack of other genera. If these records are regarded as invalid, they should have been mentioned anyway and justification for their exclusion provided.

The statement that known cactus hosts do not occur in the western U.S. is only correct in the narrowest sense. At least one species of *Cereus* (night-blooming cereus – sometimes placed in *Peniocereus*) is native to the Southwest, as is at least one species of *Stenocereus* (organ-pipe cactus).

"Widely established where most of its hosts plants occur" is an exaggeration and "known to occur throughout Florida" is clearly erroneous. While appearing established throughout southern Florida, reported distribution in northern and western Florida is much more restricted, only three counties (Hodges & Hodges 2012). Furthermore, several of the known hosts have much broader ranges, e.g., *Achryanthes aspersa* and *Alternanthera pungens*. *Acalypha, Gomphena globosa*, and *Portulaca oleracea* (with many varieties – also used as food and for traditional medicine) are popular and widely grown flowers. If "widely established" is also based on the California record, establishment there is unproven, according to the report. Doubtless, many of the documented hosts are present there as ornamentals.

A key element essential to accurate assessment of the ecological and economic risks posed by this pest has been omitted from this document. No mention is made that this species, as well as a congener (*H. festerianus*) were used as effective biocontrol agents for cacti exotic to Australia and South Africa. A situation similar to that which has arisen with *Opuntia* cacti and *Cactoblastis* could clearly develop in the diverse cacti flora found in the southwestern U.S., especially since many of the species there are columnar cacti (e.g., saguaro) and/or are in genera closely related to known hosts. This mealybug has already caused significant damage to native cacti in Puerto Rico (e.g., Zimmerman et al. 2010). Concern is sufficient that at least one biocontrol project for the mealybug in Puerto Rico has been initiated. Exclusion of this crucial information from this document is puzzling. Combined with its already evident polyphagous nature (multiple families and numerous genera), the aggressive potential of this pest poses a major threat to the ecology and economy of the southwestern U.S., as well as adjacent regions of Mexico.

Singhiella simplex

None of the conclusions supporting deregulation of fig whitefly are valid. Establishment for a short period without catastrophic consequences is not evidence that it will not become a pest in the longer run (consider the next phrase), it is already causing significant damage in several parts of Florida, official control status in California is still apparently being considered, and the IPPC quarantine pest standards are irrelevant.

Whether this pest meets the IPPC definition of a quarantine pest is irrelevant. This standard is a guideline, no more. It is not legally binding and has no significance with regard to whether a pest should be reportable/actionable in this country. It could be argued that in fact the fig whitefly meets this definition. It is of potential economic importance to a large portion of the country (all of the country, when greenhouse and nursery stock is considered), it is NOT widely distributed, and California is considering appropriate action with regard to this Q-rated pest (indicating it has high destructive potential), which may include control.

It is disingenuous, to say the least, to suggest that this insect may not be damaging to greenhouse, houseplant, landscape, and nursery fig plants. It is illogical to dismiss it as an potentially important pest because of a perhaps poor citation in the introductory section of a paper focused on natural enemies (Avery et al. 2011). Even a casual Internet search reveals it is indeed a significant pest in Florida, as indicated by numerous news articles and

Extension bulletins. The fig whitefly clearly has considerable potential to be a major pest in the aforementioned settings. This is of great concern to Oregon. Nursery products comprise the largest agricultural commodity in Oregon and ornamental figs are popular plants offered for sale in that venue.

Furthermore, this pest may be a threat to fig production. Given the numerous species of figs it attacks, it is a reasonable inference that it will attack the edible fig – most whiteflies are polyphagous within a genus, at the very least. There is certainly no evidence otherwise. The prudent and rational response is to assume it can do so until proven otherwise. Edible figs are a popular residential crop in Oregon and edible fig plants are also a favored ornamental in protected landscapes.

To conclude that an insect found only in Florida in 2007 and in California in 2012 will have little impact is ludicrous. Consider the brown marmorated stink bug and the lag time between detection and significant damage. There are many such cases with exotic species.

Lastly, deregulating this pest would increase dissemination throughout vulnerable areas, especially within greenhouses and nurseries, which would greatly increase the risk of this pest being introduced into Hawaii, Guam, and the Virgin Islands, where it could have profound impacts.

We appreciate the opportunity for Oregon's concerns to be considered with regard to these pests. Please feel free to contact James LaBonte with any questions.