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December 21, 2015

Ricardo Valdez
National Coordinator for Official Control
Federally Recognized State Managed Phytosanitary Program
USDA APHIS PPQ
Pest Management
4A-03.24
4700 River Road
Riverdale, MD 20737

Re: DEEP List due December 21, 2015

Dear Mr. Valdez:

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

- *Puccinia kuehnii*
- *Peronosora digitalis*
- *Pareleyrodes bondari*
- Blueberry Shock virus
- *Ditylechus destructor*

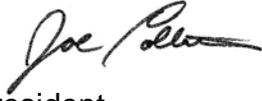
Based on the responses received from our members, the National Plant Board agrees with the recommendations proposed for *Puccinia kuehnii*, *Peronosora digitalis* and *Pareleyrodes bondari*. However, one state, Connecticut, expressed concern about *Peronosora digitalis* and those comments are provided in attachment 1 along with additional Eastern and Southern Plant Board comments.

There is also concern over *Ditylechus destructor* and Blueberry Shock Virus. Individual state and Central Plant Board comments regarding these two pests are provided within the attachments to this letter (Attachments 1 and 2). It is the position of the National Plant Board that now is not the time to move these pests through the deregulation process.

The National Plant Board looks forward to a continued close cooperation with USDA APHIS PPQ to improve the safeguarding of the agricultural and horticultural resources of states and also greatly appreciates the opportunity to

provide comments on the potential de-regulation of plant pests of mutual concern.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe Collins", with a stylized flourish at the end.

Joe Collins, President
National Plant Board

cc: NPB Board of Directors
Aurelio Posadas, Executive Secretary

Email from D. Rhodes 16Dec15

Good Afternoon – Here are the responses I received for EPB. Please let me know if you have any questions.

CT

– CT agrees with keeping the potato nematode actionable. I also have qualms about *Peronospora*; too many bad memories of the IDM outbreak of 2012, when all the impatiens suddenly disappeared/melted away. Though it may already be established, sometimes the taxonomy of these fungi are not well described, and it would be tragic if a new one sneaked in under the radar.

ME

- Maine doesn't have a problem with deregulation of these 4 pests:
Illarvirus Blueberry necrotic shock virus, Blueberry necrotic shock virus
Paraleyrodes bondari, Bondar's nesting whitefly
Peronospora digitalis, Downy mildew of foxglove
Puccinia kuehnii, Orange rust of sugarcane

We do have a question about *Ditylenchus destructor* and the possible impact on our potato industry. This is listed as part of the recommendation:

Deregulation Recommendations: *Ditylenchus destructor* is listed in the Pest ID database as reportable only when encountered in **plant propagative material**; under all other circumstances, its status is non-reportable. PPQ port policy should regard the nematode, in all cases, as non-reportable/non-actionable for the continental United States.

My assumption is that this pest would still be reportable if it was encountered during inspection of propagative material and the propagative plant material would include seed potatoes. If this is the case then Maine would be supportive of deregulating other types of materials including tablestock potatoes. At this point in review old files we have not detected this nematode in Maine.

PA

- **Blueberry Shock Virus** – PA is a little concerned with the level of scientific rigor applied to this summary. Dr. Robert Martin, ARS scientist, is doing a national survey this year on viruses in blueberry. I believe it is premature to deregulate until that survey is done. Bob's survey may confirm, or may find no support, for the virus report out of New York that is heavily quoted in here but was never published in a national forum. Michigan went to extensive efforts to *eradicate* at the one site where it was found there.

Hi Joe! New Jersey has some major concerns about the proposed deregulation of the blueberry shock virus and potato nematode *Ditylenchus destructor* for FRSMP. Contrary to the literature citing's we have yet to find either in the New Jersey environ and certainly the movement of either of these two denizens into the state would adversely affect our agricultural or blueberry industries. So would not be in agreement to deregulate these two. Sincerely, Joe Zoltowski / NJDA

Summary:

- Blueberry necrotic shock virus is established in the United States and is only known to occur in the U.S. and Canada – **Currently, most compelling info is ONLY out of the Pacific Northwest – Oregon, Washington, British Columbia. Michigan is exercising stringent control. New Jersey includes in their voluntary certification program.**

- Non-actionable status at the port of entry will not impact spread of the virus as many states require testing and certification of nursery stock to be free of Blueberry necrotic shock virus and Blueberry scorch virus. **By “many states,” I think they mean Oregon?**
- Blueberry necrotic shock virus can reduce yields, but in well-managed production areas infected plants can recover and produce well.

It might be good to wait for another year before this DEEP is considered.

Thank you – Dana

Dana D. Rhodes | State Plant Regulatory Official
PA Department of Agriculture
2301 N. Cameron St. | Harrisburg, PA 17110
Phone: 717.772.5205 | Fax: 717.783.3275 | [www. agriculture.state.pa.us](http://www.agriculture.state.pa.us)

SPB Responses

Email from T. Smith, FDACS, 21Dec15

FL
The Florida Department of Agriculture and Consumer Services-Division of Plant Industry (FDACS-DPI) reviewed the NPAG assessments for each of the five pests. FDACS-DPI agrees with the recommendation to recognize *Paraleyrodes bondari*, Blueberry necrotic shock virus, *Puccinia kueknii* and *Peronospora digitalis* as non-reportable/non-actionable at ports of entry. FDACS-DPI does not agree with the evaluation for the potato rot nematode *Ditylenchus destructor* as this nematode does not occur in Florida and is highly regulated by many countries including the European union. FDACS-DPI recommends that the status of this nematode species remain as reportable/actionable at ports of entry.

Happy holidays,
Trevor

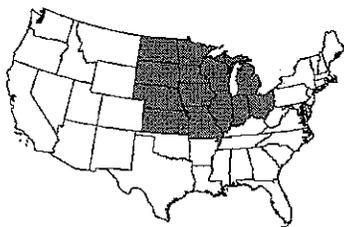
Trevor R. Smith, Ph.D.
Division Director
Division of Plant Industry
Florida Department of Agriculture and Consumer Services
Phone: (352) 395-4628

LA, VA and OK

Louisiana, Virginia and OK support the deregulation of the five pests. If I receive any further comments, I will forward to you.

Thanks.
Larry

Larry M. Nichols
Virginia Department of Agriculture & Consumer Services
Phone (804) 786-3523



THE
CENTRAL PLANT BOARD

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Minnesota · Missouri · Nebraska · North Dakota
Ohio · South Dakota · Wisconsin

December 16, 2015

Joe Collins, President
National Plant Board
Dept. of Entomology
S-225 Ag Science Ctr-N
Lexington, KY 40546-0091

Dear Joe:

The Central Plant Board (CPB) has reviewed the five plant pests being considered by USDA for deregulation. The CPB members had no comments on three of those pests: Orange rust of sugarcane (*Puccinia kuehnii*), Downy mildew of foxglove (*Peronospora digitalis*), and Bondar's Nesting Whitefly (*Paraleyrodes bondari*). However, the CPB membership disagrees with the proposal to deregulate the remaining two pests: Blueberry necrotic shock virus and Potato rot nematode (*Ditylenchus destructor*).

Michigan, as one of the largest producers of highbush blueberries in the United States, worked diligently to eradicate a single introduction of blueberry shock virus (BIShV) in 2009. Michigan has also enacted a quarantine which stipulates that only certified virus-tested blueberry propagation material may be imported from areas where blueberry shock is found. Efforts to deregulate this pest at the international borders would put Michigan's blueberry industry at greater risk for the introduction and establishment of this pest from known infested areas in Canada. Additionally, BIShV has also been identified infecting cranberry plants, and the potential for damage to these plants and the crop are as yet unknown. Blueberry and cranberry are important agricultural commodities in many CPB states. The economic value of blueberry production is over \$122 million in Michigan alone. CPB does not support deregulation at this time. States would consider participation in a FRSMP program for this pest.

The potential for deregulation of Potato rot nematode (PRN) is also of concern to the CPB states, several of which are significant potato producers. The DEEP report provides conflicting information on the scientific evidence related to occurrence and establishment of PRN in the U.S., describing it as both occurring only sporadically and in isolated areas, and also established and widespread in the continental U.S.. The state of Wisconsin enacted a state interior quarantine for PRN decades ago, and strict regulatory enforcement of this quarantine is believed to be directly responsible for minimizing damage to the crop and economic injury to the industry. Enforcement of this quarantine continues today. Concerns exist that allowing PRN infested material to enter the country unchecked undermines the efforts to control this pest and exposes the industry, particularly the seed potato industry, to significant economic risk. Consultation

with seed potato certification agencies has found support for maintaining the current regulation of this pest at ports. Additionally, PRN has a wide host range and can be introduced by plant materials in trade. In addition to the DEEP Report cited incidences, there has been an interception of PRN in garlic from Canada in recent years (see reference below). When introduced into garlic or onion fields, which are frequently under organic production where fumigation is not an option, this pest would be extremely difficult to control. Based on these facts, we recommend no change to the current port regulatory status and would prefer it to be stronger. States would consider participation in a FRSMP program for this pest.

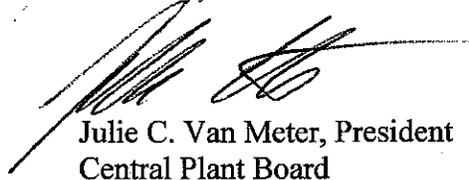
Discovery of Potato Rot Nematode, *Ditylenchus destructor*, Infesting Garlic in Ontario, Canada

Q. Yu and **M. A. Zaida**, Eastern Cereal and Oilseed Research Center, Agriculture and Agri-Food Canada, Ottawa, ON, Canada; **B. Hughes**, New Liskeard Agricultural Research Station, University of Guelph, New Liskeard, ON, Canada; and **M. Celetti**, Ontario Ministry of Agriculture, Food and Rural Affairs, Guelph, ON, Canada.

<http://apsjournals.apsnet.org/doi/abs/10.1094/PDIS-08-11-0697>

The CPB appreciates the opportunity to comment on these pests as they are being considered for deregulation. Our ability to protect the agricultural and environmental resources of our states is only enhanced through the good working relationship we have with USDA. Please don't hesitate to contact me with questions.

Sincerely,



Julie C. Van Meter, President
Central Plant Board