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December 31, 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 December 31, 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:

- *Aleurodicus dispersus*, spiraling whitefly
- *Aulacaspis tubercularis*, white mango scale
- *Bagrada hilaris*, painted bug
- *Cacoecimorpha pronubana*, carnation tortrix
- *Helix aspersa*, brown garden snail
- *Hemithea aestivaria*, common emerald
- *Parabemisia myricae*, bayberry whitefly
- *Parlatoria ziziphi*, black parlatoria scale
- *Rhyparochromus vulgaris*, palearctic seed bug
- *Scutellonema bradys*, yam nematode

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

However, some states have issues with certain pests and several have a specific issue with *H. aspersa*. The states of Louisiana, Tennessee, North Carolina, New Jersey and Idaho have issues with *H. aspersa* and have provided comments. The states of California, Florida, Hawaii and Oregon have issues with certain pests and have provided comments. California has indicated a possibility of submitting an FRSMP petition regarding pests of concern. Please see the attachments for the specific comments provided by states.

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,

A handwritten signature in black ink, appearing to read "Geir Y. Friisoe". The signature is written in a cursive style with a large initial "G" and "F".

Geir Y. Friisoe, President
National Plant Board

Attachments

cc: Aurelio Posadas, Executive Secretary
NPB Board of Directors

ATTACHMENT 1

H. aspersa Comments

DEEP LIST

Due

December 31, 2013



Steven W. Troxler
Commissioner

North Carolina Department of Agriculture
and Consumer Services
Plant Industry Division

Vernon N. Cox
Director

Phillip L. Wilson
Plant Pest Administrator

Danny A. Turner
Seed and Fertilizer
Administrator

December 30, 2013

National Plant Board
Geir Friisoe, President
Aurelio Posadas, Executive Director

North Carolina officials have reviewed the Deregulation Evaluation of Established Pests (DEEP) report and what impacts it would have on our state. We have serious concerns since *Helix aspersa*, the brown garden snail, has been included on this list. This pest poses a major risk to the agricultural interests in North Carolina such as the nursery industry.

North Carolina currently has regulations in place to prohibit the entry and production of phytophagous snails such as brown garden snail.

In addition, *Cacoecimorpha pronubana* (Carnation tortrix) was included in the deregulation list. This pest has shown to be a harmful pest in Europe and could potentially pose risk to the eastern United States.

The State of North Carolina would request the United States Department of Agriculture consider removing the brown garden snail and carnation tortrix from the regulation list due to their potential harmful impacts.

Sincerely,

Phillip L. Wilson
North Carolina State Plant Regulatory Official
Plant Pest Administrator

USDA Proposed Deregulation of *Helix aspersa*, Brown Garden Snail
State of Louisiana Comments
December 26, 2013

Submitted to National Plant Board
Geir Friisoe, President
Aurelio Posadas, Executive Director

Helix aspersa, the brown garden snail, is considered a serious pest and poses a clear threat to the nursery industry, not only in Louisiana but throughout the southeastern U.S. The extent of this threat, from its host plant range to its potential U.S. distribution and spread to its interception frequency, is specifically outlined in the USDA evaluation (DEEP Report).

The state of Louisiana maintains a brown garden snail (BGS) quarantine and actively enforces it. The state has written requirements for certification and paperwork on all nursery shipments from BGS-infested states; we spot-check incoming shipments from those states; and we look for BGS in all routine nursery grower and dealer inspections. We take action (return or destruction of plants) when BGS is found on stock.

The nursery industry continues to battle new and re-emerging pest threats in addition to overcoming other numerous obstacles, many of which are not preventable. By deregulating *Helix aspersa*, USDA would be removing restrictions on a pest that we believe can be prevented and/or controlled. In Louisiana, BGS is rarely found during routine nursery inspections on domestic imported stock, but LDAF strongly believes that if this pest is deregulated we will see an increased number of BGS finds. As a result, the risk of establishment would increase in our state and others, and this could have far reaching negative effects to our nursery industry and possibly other agronomic crops.

In 2012, the value of Louisiana's nursery industry was estimated at over \$115 million. This is an important economic industry to the state that warrants a state quarantine to protect it from pests such as BGS. Federal regulation at ports of entry provides an additional layer of protection. The state strongly disagrees with the proposed deregulation of this pest and asks that USDA consider removing BGS from the proposed deregulation list at this time. Thank you.

Richard Miller
Administrative Coordinator
Quarantine Programs
Louisiana Department of Agriculture and Forestry
Phone (225)-952-8053
rmiller@ldaf.state.la.us

USDA Proposed Deregulation of *Helix aspersa*, Brown Garden Snail
State of Tennessee Comments
December 27, 2013

Submitted to National Plant Board
Geir Friisoe, President
Aurelio Posadas, Executive Director

Helix aspersa, the brown garden snail, is considered a serious pest and poses a clear threat to the nursery industry, not only in Tennessee but throughout the southeastern U.S. The extent of this threat, from its host plant range to its potential U.S. distribution and spread to its interception frequency, is specifically outlined in the USDA evaluation (DEEP Report).

The state of **Tennessee** maintains a brown garden snail (BGS) quarantine as well as **Alabama, Arkansas, Florida, Louisiana, Mississippi, North Carolina, Oregon, South Carolina, Texas, and Virginia**, Tennessee actively enforces our Quarantine as well as other states. The state has written requirements for certification and paperwork on all nursery shipments from BGS-infested states; we spot-check incoming shipments from those states; and we look for BGS in all routine nursery grower and dealer inspections. We take action (return or destruction of plants) when BGS is found on stock.

The nursery industry continues to battle new and re-emerging pest threats in addition to overcoming other numerous obstacles, many of which are not preventable. By deregulating *Helix aspersa*, USDA would be removing restrictions on a pest that we believe can be prevented and/or controlled. In Louisiana, BGS is rarely found during routine nursery inspections on domestic imported stock, but TDA strongly believes that if this pest is deregulated we will see an increased number of BGS finds. As a result, the risk of establishment would increase in our state and others, and this could have far reaching negative effects to our nursery industry and possibly other agronomic crops.

In 2011, the value of Tennessee's nursery industry was estimated at about \$298 million and it ranked 7th in the State and 8.5% of total farm receipts. This is an important economic industry to the state that warrants a state quarantine to protect it from pests such as BGS. Federal regulation at ports of entry provides an additional layer of protection. The state strongly disagrees with the proposed deregulation of this pest and asks that USDA consider removing BGS from the proposed deregulation list at this time.

Thank you.

Gray Haun
*Tennessee Department of Agriculture
Division of Consumer and Industry Services
Plant Certification & Apiary Program Administrator
PO Box 40627, Melrose Station
Nashville, TN 37204*

Idaho Department of Agriculture Comment

From: "Yergert - CDA, Mitchell" <mitchell.yergert@state.co.us>
Subject: Fwd: [wpb] Fwd: FW: ACTION REQUESTED: 10 Pests to consider for deregulation at ports of entry or FRSMP with due date December 31, 2013

To: Geir Friisoe <Geir.Friisoe@state.mn.us>, Aurelio Posadas <aureliop@elkgrove.net>
Show: [raw text html](#)
Date: Monday, 12/02/2013 8:44 AM

FYI a comment on the latest DEEP list.

Mitch

*"Mike Cooper <Mike.Cooper@agri.idaho.gov>
Date: Mon, Dec 2, 2013 at 7:54 AM*

Subject: RE: [wpb] Fwd: FW: ACTION REQUESTED: 10 Pests to consider for deregulation at ports of entry or FRSMP with due date December 31, 2013

*To: "Yergert - CDA, Mitchell" <mitchell.yergert@state.co.us>
Cc: "wpb@nationalplantboard.org" <wpb@nationalplantboard.org>*

Mitch,

"I wish to formally object to Helix aspersa being removed from the APHIS list of actionable pest at the ports. According to the NPB web site it is a quarantine pest in AR, VA, TN, MS, MI, TX, OR, ID and AL. Also it is of very limited distribution in most of the states listed in the summary as being infested. It's potential as a horticultural pest is well known."

*Michael E. Cooper, Bureau Chief
Plant Industries Division
Idaho State Department of Agriculture"*

New Jersey Department of Agriculture Comment

"The New Jersey Department of Agriculture is opposed to the proposal by PPQ to deregulate Helix aspera (Cornu aspersum) at ports of entry as part of the DEEP process. While H. aspera has been reported in New Jersey, it has been limited to residential areas on barrier islands off the mainland. We spent many years eradicating the two populations, and want to keep this serious plant pest from establishing elsewhere in our state."

ATTACHMENT 2

Pest Comments

DEEP LIST

Due

December 31, 2013



December 23, 2013

Oregon Department of Agriculture Comments on DEEP Reports and Recommendations for:
Aleurodicus disperses, Aulacaspis tubercularis, Bagrada hilaris, Cacoecimorpha pronubana, Helix aspersa, Hemithea aestivaria, Parabemisia myricae, Parlatoria ziziphi, Rhyparochromis vulgaris, and Scutellonema bradys.

Oregon agrees with the recommendations in the DEEP reports regarding *Aleurodicus disperses, Bagrada hilaris, Cacoecimorpha pronubana, Helix aspersa, Hemithea aestivaria, Parabemisia myricae, Parlatoria ziziphi, Rhyparochromis vulgaris,* and *Scutellonema bradys*. We disagree with the recommendations for *Aulacaspis tubercularis*.

Aulacaspis tubercularis

None of the conclusions supporting deregulation of the white mango scale are valid. Establishment for a short period (eleven years!) without consequences is not evidence that it will not become a pest in the longer run - consider the lag before brown marmorated stink bug was recognized as other than a nuisance pest. To conclude that an insect found only in Florida in 2002 will have little impact is ludicrous.

Context is also important to consider. Just because it has not yet caused significant damage in Florida does not mean in a different climate with different hosts that it will be similarly benign (consider California) or that it could not flourish as a greenhouse pest. As with many scales, it has a broad host range and it is not possible to predict which novel hosts it might favor. Furthermore, it is already known from citrus (consider California).

The implication that it will not spread further in the U.S. because it hasn't spread much in Florida (yet!) in a mere eleven years is not supported by its extensive range elsewhere. A predominance of interceptions in baggage-carried fruit over detection on live plants is not evidence that the latter pathway is insignificant. Scales are notoriously difficult to detect on live plants.

Lastly, deregulating this pest would lead to dissemination throughout vulnerable areas, especially via greenhouses and nurseries, and subsequently fruit in baggage. The risk of this pest being introduced into Hawaii and the Pacific territories, where it could have profound impacts (mango is an important crop there), would be greatly increased.

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.



DEEP Report for 10 pest species (due Dec. 31, 2013)

Aleurodicus dispersus (Spiraling whitefly) Aleyrodidae	Established in Hawaii, OK to deregulate
Aulacaspis tubercularis (White mango scale) Diaspididae	Not established in Hawaii, agree with conclusion that it should remain reportable/actionable for Hawaii.
Bagrada hilaris (Bagrada bug) Pentatomidae	Not established in Hawaii, agree with conclusion that it should remain reportable/actionable for Hawaii.
Cacoecomorpha pronubana (Carnation tortrix) Tortricidae	Not established in Hawaii, disagree with conclusion that it is not likely that it would be capable of outdoor establishment in Hawaii. Higher elevations on Hawaii Island and Maui simulate temperate climate, and may be climatologically suitable for establishment. There are many native forest plants (some endangered) on higher elevations, which are potential hosts to this polyphagous pest. Should remain reportable/actionable for Hawaii.
Helix aspersa (Brown garden snail) Hygromiidae	Established on Hawaii Island and Maui, believed to be eliminated from Oahu and Kauai. (Cowie, 1997). Hawaii Plant Quarantine Branch still actively regulates its movement between islands. Should remain reportable/actionable for Hawaii.
Hemithea aestivaria (Common emerald) Geometridae	Not established, agree with conclusion that it should remain reportable/actionable for Hawaii.
Parabemisia myricae (Bayberry whitefly) Aleyrodidae	Established in Hawaii, is not causing significant economic or environmental impacts. OK to deregulate.

Hawaii Department of Agriculture

Parlatoria ziziphi (Black parlatoria scale)
Diaspididae

Established in Hawaii for over 100 years. OK to deregulate.

Rhyparochromus vulgaris (Palearctic seed bug)
Rhyparochromidae

Not established in Hawaii, agree with conclusion that it should remain reportable/actionable for Hawaii.

Scutllonema bradys (Yam nematode)
Hoplolaimidae

Not established, agree with conclusion that it should remain reportable/actionable for Hawaii.

Reference:

Cowie, R.H. 1997. Catalog and bibliography of the nonindigenous nonmarine snails and slugs of the Hawaiian Islands. Bishop Museum Occasional Papers 50: 20-21. Honolulu, HI. Bishop Museum Press.

Neil Reimer, Ph.D.
Acting Administrator
Plant Industry Division
Hawaii Department of Agriculture
1428 S. King St., Honolulu, HI 96814
Neil.J.Reimer@hawaii.gov
(808) 973-9535

December 2013 DEEP Comments

Aleurodicus dispersus Russell: Spiraling whitefly

Aleurodicus dispersus is a highly polyphagous whitefly that feeds on a wide variety of plants in 49 plant families and has never been found in the environment of California. It can be expected to establish in the state. Many of the known hosts are economically important including avocado, citrus, rose, stone fruit, and palms. It is expected that this whitefly will cause economic damage when it arrives in California, especially to the state's nursery industries, given the presumed absence of biological control agents reported to control it in other states. Furthermore, Arizona maintains a quarantine against all whiteflies on citrus, so there may be some disruptions to the movement of fruit. It may also have environmental impacts including feeding on the endangered small-leaved rose (*Rosa minutifolia*) and triggering chemical treatments by residents and the nursery industry. This whitefly has been intercepted by CDFA more than 1,300 times since 11/29/2000 on shipments of plants, leaves, and flowers from Florida and Hawaii. CDFA may petition for FRSMP for *Aleurodicus dispersus*.

Aulacaspis tubercularis Newstead: White mango scale

Aulacaspis tubercularis is a polyphagous scale insect that feeds on a wide variety of plants in 23 plant families, with mango as the preferred host. Some of the alternative hosts are also economically important crops in California including avocado, stone fruit, and citrus. The scale is considered a quarantine pest by New Zealand¹ and Korea², and the DEEP report proposes to keep the pest actionable in Hawaii and the Pacific territories. If the scale were to establish in California, it could cause some interruptions to commerce with these trading partners. Furthermore, there is some commercial production of mango in San Diego County that could face economic damage including lower yields and/or increased production costs. Environmental damage is expected to be limited to possible increased chemical treatments of nursery stock and mango production. CDFA may petition for FRSMP for *Aulacaspis tubercularis*.

¹<http://www.biosecurity.govt.nz/files/biosec/consult/draft-ihs-mango-vietnam-rmp.pdf>

² http://astp.jst.go.jp/modules/search/DocumentDetail/1226-8615%2B%2540%2B_10_4_Key%2Bto%2BSpecies%2Bof%2BAulacaspis%2B%2528Hemiptera%253A%2BDiaspididae%2529%2BIntercepted%2Bat%2Bthe%2BRepublic%2Bof%2BKorea%2BPorts%2Bof%2BEntry_N%252FA

Bagrada hilaris (Burmeister): Bagrada bug

Bagrada hilaris is now widespread in the southwestern United States including California, Arizona, New Mexico, Texas, Nevada, and Utah. The bug is capable of rapid dispersal through the environment on weedy plants such as roadside wild mustards and is not under official control. CDFA concurs with the deregulation of *Bagrada hilaris*.

Cacoecimorpha pronubana (Hübner): Carnation tortrix

Although *Cacoecimorpha pronubana* has been present in the Pacific Northwest since 1964, California has only recently (2010 & 2011) started to find the moth on shipments of nursery stock from Oregon. There are also very recent reports of outbreaks of carnation tortrix in New York (2012) and at

the Denver Zoo (2013) that are likely linked to the movement of nursery stock. Carnation tortrix has never been found in the environment of California, where floral and nursery products are a \$3.29 billion industry that is at risk of contamination by the moth. The moth is highly polyphagous and is reported to feed on more than 160 species of plants in 42 families. Europe¹, China², and Japan³ list carnation tortrix as a quarantine pest. Carnation tortrix is considered a greenhouse pest in Europe and may have significant impacts on the nursery industry here by feeding on flower buds, increasing production costs, and triggering a loss of markets. In addition to possible increased chemical treatment of nursery stock, another potential environmental impact is that at least four species listed as threatened or endangered plants are potential hosts for the moth including showy Indian clover (*Trifolium amoenum*), pacific grove clover (*Trifolium polyodon*), Monterey clover (*Trifolium trichocalyx*), and small-leaved rose (*Rosa minutifolia*). Due to potentially significant economic and environmental impacts, CDFA may petition for FRSMP for *Cacoecimorpha pronubana*.

¹http://www.eppo.int/QUARANTINE/insects/Cacoecimorpha_pronubana/TORTPR_ds.pdf

²http://www.fas.usda.gov/ffpd/wto_sps_tbt_notifications/forest_products/CH97_pest_list.pdf

³http://www.maff.go.jp/j/syouan/keneki/kikaku/pdf/qp_list.pdf

Helix aspersa (Müller): Brown garden snail

Helix aspersa is widespread in the United States and of general distribution in California. CDFA concurs with the deregulation of *Helix aspersa*.

Hemithea aestivaria (Hübner): Common emerald

Hemithea aestivaria is a polyphagous foliage feeding moth that is widespread in Asia and was accidentally introduced into British Columbia in 1979. It has been in Washington State since 1985. The moth has only been intercepted twice at U.S. ports and has never been intercepted by CDFA, indicating that it very rarely moves in trade. Although common emerald is likely to be managed by existing IPM programs in most agricultural environments, the moth may have some economic impacts to California as it is considered a quarantine pest by Australia and is proposed to remain actionable in Hawaii. It may also have some environmental impacts as some growers could treat to ensure commodities are free from this pest. CDFA has no comment on the deregulation of *Hemithea aestivaria*.

Parabemisia myricae (Kuwana): Bayberry whitefly

Parabemisia myricae has been established in California since 1978 and is now presumably widespread and is considered successfully managed by biological control agents. No samples of the whitefly have been submitted to CDFA from the environment since 1997. CDFA concurs with the deregulation of *Parabemisia myricae*.

Parlatoria ziziphi (Lucas): Black citrus scale

Parlatoria ziziphi is a polyphagous scale insect that feeds on a variety of plants in 12 plant families. It is most commonly found on citrus, but has also been found on stone fruit, pear, and avocado. There are already scale insects that are serious pests of citrus present in California (e.g., *Aonidiella aurantii*) and it is expected that damage from *P. ziziphi* will likely be mitigated by existing grove management practices. However, the scale is reported to be absent by New Zealand and Australia. The presence of the scale in California could potentially disrupt trade with these markets. This scale is not

expected to have any significant environmental impacts in California. CDFA may petition for FRSMP for *Parlatoria ziziphi*.

Rhyparochromus vulgaris (Schilling): Palearctic seed bug

Rhyparochromus vulgaris is a seed bug that feeds on the seeds of numerous plants but has never been reported to cause economic damage. It is sometimes considered a nuisance pest when populations move indoors to overwinter. Although the bug is not expected to cause any direct economic or environmental damage in California, the DEEP report proposes to keep *R. vulgaris* actionable in Hawaii, Guam, Puerto Rico, and the Virgin Islands. If large populations of the seed bug were to establish in California this could lead to disruptions in trade with these markets. This could also lead to significant environmental impacts as some merchants may be forced to fumigate or otherwise treat commodities. CDFA has no comment on the deregulation of *Rhyparochromus vulgaris*.

Scutellonema bradys (Steiner & LeHew) Andrásy: Yam Dry Rot Nematode

The California Department of Food and Agriculture is in agreement with the proposed deregulation of *Scutellonema bradys* as a federal pest. The non-production of *Dioscorea* tubers, low nematode population numbers and suitable climate conditions are pertinent factors that have contributed to the limited distribution of the nematode species within the United States for over 50 years without reports of any economic loss. However, the nematode species is of concern to California as an actionable pest in order to protect its multi-million sweet potato and potato industries. The State produces 20% of the nation's sweet potatoes (Stoddard *et al.*, 2013). While yam is the main host of *S. bradys*, the nematode species is also a potential threat to sweet potato (*Ipomea batatas*) and potato (*Solanum tuberosum*) production. Significant damage to both tuberous crops has been reported in Costa Rica (Humphreys-Pereira *et al.*, 2013; Van den Berg *et al.*, 2013). The nematode species is not known to be present in California even though suitable climate exists for its establishment.

References:

- Humphreys-Pereira, D. A., V. M. Williamson, S. Lee, D. L. Coyne, L. Salazar and L. Gómez-Alpízar. 2013. Molecular and morphological characterization of *Scutellonema bradys* from yam in Costa Rica and Development of specific primers for its detection. *Nematology (In press)* 1-11.
- Stoddard, C. S., R. M. Davis and M. Cantwell. 2013. Sweet production in California. University of California Agriculture and Natural Resources Publication 7237.
- Van den Berg, E., L. R. Tiedt, D. L. Coyne, A. T. Ploeg, J. A. Navas-Cortés, P. A. Roberts, G. W. Yeates and S. A. Subbotin. 2013. Morphological and molecular characterization and diagnostics of some species of *Scutellonema* Andrásy, 1958 (Tylenchida: Hoplolaimidae) with a molecular phylogeny of the genus. *Nematology (In press)* 1-27.

From: "Gaskalla, Richard" <Richard.Gaskalla@freshfromflorida.com>
Subject: FW: ACTION REQUESTED: 10 Pests to consider for deregulation at ports of entry or FRSMP with due date December 31, 2013
To: geir.friisoe@state.mn.us
Cc: "Aurelio Posadas, NPB Executive Secretary" <aureliop@elkgrove.net>, "Dixon, Wayne" <Wayne.Dixon@freshfromflorida.com>
Show: [raw text html](#)
Date: Monday, 12/23/2013 12:34 PM
[Florida comments on the 10 pests. Richard](#)

From: Hamm, Denise **On Behalf Of** Gaskalla, Richard
Sent: Monday, December 23, 2013 1:41 PM
To: 'APHIS-FRSMP'; 'Schuble, Diane L - APHIS'
Cc: Dixon, Wayne; Hodges, Greg; Conti, Lisa
Subject: RE: ACTION REQUESTED: 10 Pests to consider for deregulation at ports of entry or FRSMP with due date December 31, 2013

Diane,

The Florida Department of Agriculture and Consumer Services-Division of Plant Industry (FDACS-DPI) reviewed the pest list and related DEEP (Deregulation Evaluation of Established Pests) reports. FDACS-DPI strongly disagrees with the recommendation to deregulate the following pests at ports of entry: *Bagrada hilaris* (bagrada bug), *Cacoecimorpha pronubana* (Carnation tortrix), *Helix aspersa* (brown garden snail), *Parlatoria ziziphi* (Black parlatoria scale) and *Rhyparochromus vulgaris* (Palearctic seed bug).

Bagrada hilaris (bagrada bug) is known to be established in Arizona and California and has recently been reported in New Mexico and Texas. The bagrada bug has not been found to be established in the eastern United States although Florida has intercepted it several times (14 times over the past two years) on produce from states with established populations. FDACS-DPI has reviewed petitions to deregulate this pest previously and we still maintain our disagreement with the possibility of deregulating this pest insect as it is considered to be a potential significant pest to Florida agriculture. FDACS-DPI recommends keeping the bagrada bug as reportable / actionable at ports of entry.

Cacoecimorpha pronuba (carnation tortrix) has a limited distribution limited to California, Oregon and Washington. The carnation tortrix is considered to be a polyphagous pest with a host range that includes several ornamental plants, coniferous trees, fruit trees and vegetables. Because of the wide host range and that it has been reported as a pest of commercial crops in Europe, FDACS-DPI considers the carnation tortrix as a potential economic pest to Florida agriculture and recommends keeping this insect listed as reportable/actionable at ports of entry.

Helix aspersa (brown garden snail) is not found in Florida and is listed as a quarantine pest in Florida Administrative Code, Rule 5B-3. The brown garden snail has a wide host range and could readily establish in Florida and become a significant nursery and agricultural pest. FDACS-DPI recommends keeping the brown garden snail as reportable/actionable at ports of entry.

Parlatoria ziziphi (black parlatoria scale) is no longer found in Florida. The last recorded record for the black parlatoria scale in Florida is from 1998. FDACS-DPI routinely conducts surveys for citrus pests and if it were present, inspections would have found subsequent samples following the last detection of 1998. The reason for this apparent 'eradication' may be in part a result previous citrus canker eradication programs in Florida where many citrus trees were removed from South Florida as well as other control actions. The black parlatoria scale has the ability to be a significant pest to citrus and is

listed as quarantine pest in the Florida Administrative Code, Rule 5B-3. FDACS-DPI recommends keeping the black parlatoria scale as reportable/actionable at ports of entry.

Rhyparochromus vulgaris (Palearctic seed bug) has only been reported from Montana, Oregon and Washington. Although literature does not report this seed bug as being an economic pest of significance, it is listed as a polyphagous seed feeder. Because of this FDACS-DPI scientific staff has concerns about this insect becoming a pest in Florida's natural environment. At this point in time, FDACS-DPI recommends keeping *R. vulgaris* listed as reportable/actionable at ports of entry.

It is unfortunate that these major pest species are being considered for a lower level of regulatory attention, when if anything, due to their limited distribution and potential to cause significant harm continued safeguarding should occur to protect the large number of States still not infested.

We appreciate the opportunity to provide feedback. Feel free to contact my office if you have any questions or would like to discuss further.

Regards,
Richard

Richard Gaskalla
Division Director
Division of Plant Industry
Florida Department of Agriculture and Consumer Services

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