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September 11, 2012

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Diane L. Schuble
National Coordinator for Official Control
USDA, APHIS, PPQ
PHP-Pest Detection & Evaluation
4700 River Rd., Unit 26
Riverdale, MD 20737

Dear Diane,

I am writing in response to your September, 2012 request regarding the position of the National Plant Board (NPB) relative to the USDA, CPHST – PERAL DEEP report proposing the deregulation of *Yponomeuta malinellus*, apple ermine moth (AEM) in the U.S.

The NPB has solicited comments from our member states regarding this pest. We have reviewed these comments and in particular the responses from some of our major apple growing states. Based on these comments, the NPB is not opposed to the USDA proposal for deregulation of this pest and concurs with the recommendation of the DEEP project to list this pest as non-reportable/non-actionable.

For your information, Dr. Larry Gut, Ext. Entomologist with Michigan State University and Terry Walker, SPRO of Arkansas expressed concerns about the incidental control of this pest by broad-spectrum pesticides. As these materials are phased out or as apple IPM programs become more and more dependent on reduced-risk, less broad-spectrum compounds, there may be a build up of AEM in the apple growing areas. I would suggest that USDA consider this concern and support monitoring for this pest as a part of on-going fruit pest survey activities.

The NPB appreciates the opportunity to provide comments on this proposed deregulation and looks forward to any future dialogue and cooperation.

Sincerely,

A handwritten signature in black ink that reads 'Michael E. Cooper'.

Michael E. Cooper, President
National Plant Board

Cc: NPB Board of Directors
Aurelio Posadas, Exec. Sec. NPB