

**GENERAL ADMINISTRATION OF QUALITY SUPERVISION, INSPECTION
AND QUARANTINE OF THE PEOPLE'S REPUBLIC OF CHINA**

To: Dr. Murali Bandla
Assistant Deputy Administrator
Phytosanitary Issues Management
Plant Protection and Quarantine

February 6, 2012

Letter of Comments on the Proposed Rule of Chinese Sand Pears

Respectful Dr. Murali Bandla,

We received the letter on December 21, 2011 from APHIS IS Beijing Office notifying us that the proposed rule of Chinese sand pears was published. First of all, we would like to appreciate for all the efforts of you and your colleagues for the publication of the proposed rule of Chinese sand pears. We paid high attention on this proposed rule and timely organized the related experts and the pear industries to review it. We basically accept the related content of the proposed rule. Now we proposed the two suggestions for revision as follows:

1. Issue of quarantine pests concerned by the U.S. side. In this proposed rule, *Guignardia pyricola* (Nose) W. Yamam. (= *Botryosphaeria berengeriana* f. sp. *Piricola*) is listed as quarantine pest. However, the most updated research results of the Chinese apple disease expert, Prof. Guo Liyun and her colleagues showed that the causing pathogen of apple and pear ring spot in China is *Botryosphaeria dothidea*. This result was published in November, 2011 on the first look of 2011 of Plant Disease in the U.S. (See Attachment: Tang, et al. 2011. Phylogenetic and pathogenic analyses show that the causal agent of apple ring rot in China is *Botryosphaeria dothidea*. Plant Disease. (First look of 2011)) This pathogen is a common disease on the U.S. pears. So the Chinese experts think this pest should be deleted from the quarantine pest list.

2. Requirement of place of production. Article (b) 5) of this proposed rule states that “if any of the listed quarantine pests is detected at a registered place of production, APHIS could reject the consignment or prohibit the importation into the United States of sand pears from the place of production for the remainder of the season. The exportation to the United States of sand pears from the place of production could resume in the next growing season if an investigation is conducted and APHIS and the NPPO conclude that appropriate remedial action has been taken.” According to Article 2.3 of the “Memorandum of Understanding Regarding the Procedures for On-Animal Interceptions of Quarantine Pests in Fresh Fruit”, the Chinese side suggests that it is amended as “if any of the listed quarantine pests is detected during the inspection at the port of entry, APHIS could reject the consignment or prohibit the importation into the United States of sand pears from the place of production for the remainder of the season. The exportation to the United States of sand pears from the registered orchard or production block resume

in the next growing season if an investigation is conducted and APHIS and the NPPO conclude that appropriate remedial action has been taken.”

With all the best wishes and looking forward for reply,

Shi Zongwei
Deputy Director General
Department for Supervision on Animal and Plant Quarantine
General Administration of Quality Supervision, Inspection and Quarantine
The People's Republic of China

CC: USDA APHIS IS Beijing Office

Attachment:

Tang, et al. 2011. Phylogenetic and pathogenic analyses show that the causal agent of apple ring rot in China is *Botryosphaeria dothidea*. Plant Disease. (First look of 2011)

Literature 1: Phylogenetic and pathogenic analyses show that the causal agent of apple ring rot in China is *Botryosphaeria dothidea*

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Apple ring rot and *Botryosphaeria* canker are severe diseases affecting apple production in China, but there is confusion regarding which pathogens cause these diseases and their similarity to other diseases, such as white rot of apple, and ring rot and *Botryosphaeria* canker of pear. In this study, the pathogen of apple ring rot in China was compared with the pathogen of apple ring rot in Japan and Korea, the pathogen of *Botryosphaeria* canker of apple and pear in China, the pathogen of pear ring rot in China, and the pathogen of white rot of apple in the United States. Comparisons were based on morphology, pathogenicity on branches and fruit, and sequences of rDNA in the ITS region and of the β -tubulin and actin genes. Results showed that the causal agent of apple ring rot and *Botryosphaeria* canker of apple in China was *Botryosphaeria dothidea*, which has also been reported to be the pathogen of apple ring rot in Korea and Japan. Pathogenicity tests showed that *B. dothidea* infection on apple and pear branches may induce wart or canker symptoms depending on the conditions. These results are consistent with the hypothesis that the same pathogen causes the wart symptom of apple ring rot and the *Botryosphaeria* canker symptom on apple branches in China. The results also suggest that apple ring rot and white rot are the same disease and are caused by *B. dothidea*. Finally, *B. dothidea* isolates from pear and other fruit or forest trees may serve as inoculum for apple ring rot.