To: http://www.regulations.gov/search/Regs/home.html#docketDetail?R=APHIS-2008-0015
From: Dr. Wayne Dixon
Date: August 6, 2010
Subject: Citrus Greening and Asian Citrus Psyllid; Quarantine and Interstate Movement Regulations; Docket ID: APHIS-2008-0015

To Whom It May Concern:

It seems that labeling requirements for regulated nursery stock produced within an area quarantined for citrus greening (Sec. 301.76-4) are redundant as long as Florida nurseries already have proper labels in place for each plant they procure. Already, citrus plants have a number of labels; one more is unnecessary and likely to be ignored. A better option would be to amend a current label with the necessary cautionary language.

We realize huanglongbing (HLB) is a highly destructive systemic bacterial disease that is threatening all commercial and residential citrus in US including Florida and the citrus psyllid, *Diaphorina citri*, can be transported by hitchhiking on host plants via unregulated movement of citrus; however, the risk of introduction of HLB to citrus-producing states via movement of regulated commercial nursery stocks is very low, especially due to the protection achieved through the imidachloprid-drenching of commercial citrus plants of intra- and interstate destined plants. Thus, any further labeling requirements are excessive.

Among the HLB alternative hosts such as *Severinia buxifolia* (Chinese box orange), *Limonia acidissima* (woodapple), and *Clausena lansium* (Chinese wampi), *Murraya paniculata* (orange-jasmine) is considered to be the most preferred host of *D. citri.* Scientists from Florida, Brazil, and China report finding HLB bacteria in symptomatic leaves of the host orange-jasmine using microscopy and PCR detection methods and the HLB bacterium in orange-jasmine was further confirmed by graft transmission of the bacterium from citrus to Murraya and by dodder transmissions from *M. paniculata* to citrus. Although initial experiments to explore psyllid transmission of the pathogen from Murraya to citrus were successful, the bacterial population level in Murraya plants was found to be low and decrease over time; therefore its function as an initial inoculum is questioned. Scientists specialized in HLB research around the world fully expect additional proof that *M. paniculata* is both a host of the HLB pathogen, and that psyllids can spread the disease to citrus from Murraya; however, it is still too early to determine if commercial nursery stocks would be an initial source of inoculum to spread HLB to the other citrus-producing states.

Florida's current citrus plant health regulations require that all citrus, including *M. paniculata* plants, be propagated and produced in a greenhouse or other insect-proof structure to ensure a psyllid-free environment for producing clean *M. paniculata* plants. All stock plants supplying propagation material must be free of the pathogen and protected similarly. Florida's stance is that citrus nursery stock from a commercial nursery under these kind of requirements are free of HLB bacterium and pose no risk of spreading the disease to other states through interstate movement. To prevent HLB spread via host interstate movement, all Floridians and visitors are -and will continue to be- advised not to purchase, receive or transport any citrus from friends, relatives and/or unregistered individual home nurseries.

It is our understanding that there are continued efforts and discussions ongoing between PPQ, the citrus industry and state plant regulatory officials to define and facilitate interstate movement of commercial citrus nursery stock grown under a clean plant stock systems approach. This issue is somewhat addressed in this notice on page 34330, column 2, 3rd paragraph.

Sincerely,

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