

Tree-Fruit Technical Advisory Council (TreeTAC)

TreeTAC Steering Committee

Dr. Jim McFerson, Chairman
Washington State Tree Fruit Research
Commission
Wenatchee, WA 98801
Phone: 509-665-8271
Fax: 509-663-5827
mcferson@treefruitresearch.com

Dr. Robert Binkley
Knouse Foods Cooperative, Inc.
Biglerville, PA 17307
Phone: 717-677-9115
Fax: 717-677-9502
rbinkley@knouse.com

Dr. Jay Brunner
Washington State University
Tree Fruit Research & Extension Center
Wenatchee, WA 98801
Phone: 509-663-8181 x238
Fax: 509-662-8714
jfb@wsu.edu

Dr. Douglas G. Pfeiffer
Virginia Polytechnic Institute and State
University
Department of Entomology
205C Price Hall
Blacksburg, VA 24061-0319
Phone: 540-231-4183
Fax: 540-231-9131
dgpfeiffer@vt.edu

Dr. David Rosenberger
Cornell University
Highland, N.Y. 12528
Phone: 845-691-7231
Fax: 845-691-2719
dar22@cornell.edu

Dr. Michael Willett
Northwest Horticultural Council
Yakima, WA 98901
Phone: 509-453-3193
Fax: 509-457-7615
willett@nwhort.org

Dr. John Wise
Michigan State University
East Lansing, MI 48824
Phone: 517-432-2668
Fax: 517-353-5508
wisejohn@pilot.msu.edu

Dr. Keith S. Yoder
Virginia Tech Ag. Research
& Extension Center
595 Laurel Grove Road
Winchester, Va. 22602
Phone: 540-869-2560 Ext. 21
Fax: 540-869-0862
ksyoder@vt.edu

Nancy Foster, Treasurer
U.S. Apple Association
Vienna, VA 22182
Phone: 703-442-8850
Fax: 703-790-0845
nfoster@usapple.org

Christian Schlect, Secretary
Northwest Horticultural Council
Yakima, WA 98901
Phone: 509-453-3193
Fax: 509-457-7615
schlect@nwhort.org

Serving the biosecurity interests of the U.S. deciduous tree-fruit industry

February 8, 2012

Donna L. West, Senior Import
Specialist, Regulatory Coordination and Compliance
USDA/PPQ/APHIS
4700 River Road, Unit 133
Riverdale, MD 20737-1231

Re: Docket No. APHIS-2011-0007

Dear Ms. West:

The Tree-Fruit Technical Advisory Council (TreeTAC) was formed in 2001 to ensure that potential imports of deciduous tree fruits from non-traditional sources pose no insect or disease threats to our domestic production areas. TreeTAC is aided in its work by a group of scientists with technical expertise in entomology and plant pathology. These experts include: Dr. Jay Brunner, entomologist, Washington State University; Dr. Douglas Pfeiffer, entomologist, Virginia Tech; Dr. David Rosenberger, plant pathologist, Cornell University; Dr. John Wise, entomologist, Michigan State University; Dr. Keith Yoder, plant pathologist, Virginia Tech; and Dr. Broc Zoller, private pest management consultant and plant pathologist, Kelseyville, California.

As part of their work on TreeTAC's behalf, these science advisors reviewed your agency's proposed rule regarding the Importation of Chinese Sand Pears from China. We are providing these observations, questions and concerns to you to aid USDA/APHIS/PPQ in its consideration of the Chinese request to export sand pears to the U.S.

It was the conclusion of the agency that "(t)he following 16 quarantine-significant pests were likely to follow the pathway (i.e., accompany shipments of pear)":

Acrobasis pyrivorella (Matsumura) (Lepidoptera: Pyralidae)
Alternaria gaisen Nagano (Ascomycetes: Pleosporales)
Amphitetranychus viennensis (Zacher), Hawthorn spider mite

33 Old Courthouse Road, Suite 200 • Vienna, Virginia 22182-3816
telephone **703.442.8850** facsimile **703.790.0845**

Aphanostigma iaksuiense (Kishida)
Bactrocera dorsalis (Hendel) (Diptera: Tephritidae)
Calepitrimerus neimongolensis Kuang and Geng (Acari: Eriophyidae)
Carposina sasakii Matsumura (Lepidoptera: Carposinidae)
Ceroplastes japonicus Green (Hemiptera: Coccidae)
Ceroplastes rubens Maskell (Hemiptera: Coccidae)
Conogethes punctiferalis (Guenée) (Lepidoptera: Pyralidae)
Grapholita inopinata (Heinrich) (Lepidoptera: Tortricidae)
Guignardia pyricola (Nose) W. Yamamoto
Monilinia fructigena Honey in Whetzel (Ascomycetes: Helotiales)
Phenacoccus pergandei Cockerell (Hemiptera: Pseudococcidae)
Planococcus kraunhiae (Kuwana) (Hemiptera: Pseudococcidae)
Venturia nashicola Tanaka and Yamamoto (Ascomycetes: Pleosporales)

We have a number of questions/comments regarding the proposed rule. In our letter of April 21, 2009 we identified the following concerns in regard to the original risk assessment completed for this access request. We believe the following concerns are still relevant:

- While it was useful to have a review of pest interceptions on pear at U.S. ports-of-entry for the years 1995-2009 we asked to have this information on a chronological basis by port of entry to determine if interceptions are rising or falling or if the location of the interception is changing? We again respectfully request that information in your response to this notice. To ensure that we clearly understand the potential phytosanitary risks we also request that, in your response, you include interception data from *Pyrus* spp. imported from China for the 2009, 2010 and 2011 shipping seasons, recognizing that the latter season is still in progress.
- Since this is the third pear species under consideration by APHIS for access from China, we assume the above represents an unusually refined and complete list of quarantine significant pests. However, please inform us if the Plant Epidemiology and Risk Analysis Laboratory (PERAL) at the Center for Plant Health Science and Technology (CPHST) conducted an analysis of pests intercepted on Chinese pears arriving in other markets? I know that PERAL or perhaps APHIS' International Services likely has contacts with some of our trading partners who also import pears from China which might give a more varied view of arthropods and diseases that might arrive on *Pyrus* fruit. If PERAL has not cast its net that far afield, we request that a survey of this type be done in your response to this comment. Particularly, if other countries have allowed the import of sand pears from all of China, PERAL might be able to get some idea of differential risk compared to pears coming solely from Hebei, Shandong and western China. Has APHIS included this type of information into its current thinking regarding the risk of sand pear imports from China?
- We note that the proposed rule omits specific mention of the species *Alternaria yaliinficiens* that has been frequently detected on Ya pears. This seems to us to be a serious omission. Why was *Alternaria yaliinficiens* dropped from the list of quarantine pests for sand pears?

Additionally, as this process moves forward, TreeTAC remains concerned regarding the movement of other diseases beyond *A. yaliinfaciens*. In particular we are concerned with incipient fruit infections of *V. nashicola* and *M. fructigena* which may be more likely to occur on sand pears given that exports to the U.S. might occur from a broader geographical area under more varied environmental conditions (i.e. more rainfall and warmer temperatures in the early season) resulting in a greater likelihood of fruit infection. Given that pears will likely move from areas beyond the Ya and fragrant pear production areas and from areas with possibly higher disease pressure, what system will be put in place to ensure that fruit infested with either of these two fungi will not move to the U.S.?

In the past year, another fungal species, *Monilia polystroma*, (first reported from Japan in 2003 and now also occurring in Hungary, the Czech Republic¹ and Switzerland²) was reported to occur in China's Heilongjiang Province. Pear is apparently considered part of its host range. Has APHIS conducted its own risk assessment regarding the likelihood of *M. polystroma* moving to the U.S. on infected sand pears? What was the result of that assessment?

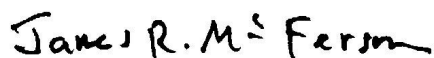
The proposed rule notes that the original pest risk assessment specified "that measures beyond standard port-of-entry inspection are required to mitigate the risks posed by these plant pests." It is TreeTAC's position, should APHIS determine that appropriate phytosanitary management conditions could be put in place to allow trade to begin, that our concerns are clearly factored into the necessary work plan measures to protect U.S. agriculture. Until we understand the measures chosen to provide phytosanitary security, we remain concerned regarding this proposed rule.

It will be the responsibility of China's NPPO or its designees to carry out much of the quarantine security work to ensure that U.S. agriculture is protected should shipments of sand pears be allowed. Please tell us what steps APHIS takes to ensure that those organizations have the proper independence and professionalism, given that large-scale export of horticultural commodities from China to our country is a relatively recent occurrence.

Thank you for the opportunity to comment on this proposed rule. Please do not hesitate to contact our office if there are additional questions.

Sincerely yours,

TREE-FRUIT TECHNICAL ADVISORY COUNCIL



Dr. James McFerson
Chairman

cc: TreeTAC

¹European Plant Protection Organization. 2011. EPPO Reporting Service. 6:134
<http://archives.eppo.org/EPPOReporting/2011/Rse-1106.pdf>. Accessed February 9, 2012

² M. Hilber-Bodmer, V. Knorst, T. H. M. Smits, and A. Patocchi. 2012. First Report of Asian Brown Rot Caused by *Monilia polystroma* on Apricot in Switzerland. Plant Disease. 96(1):146