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Subject: Federal Docket APHIS 2013-0081; Standardizing Phytosanitary treatment Regulations: Approval of Cold treatment and Irradiation facilities; Cold treatment schedules; Establishment of fumigation and cold treatment compliance agreements.

The Florida Department of Agriculture and Consumer Services-Division of Plant Industry (FDACS-DPI) reviewed the proposed rule (APHIS 2013-0081) regarding the 'Standardization of Phytosanitary treatment Regulations: approval of cold treatment and irradiation facilities, cold treatment schedules, and establishment of fumigation and cold treatment compliance agreements. FDACS-DPI is not supportive of treatment at the point of destination of regulated commodities originating from known areas that support *Anastrepha*, *Bactrocera*, *Ceratitis*, or *Dacus* fruit fly populations.

Florida is well recognized as a sentinel state and currently ranks as number two in overall invasive pest introductions. Florida is unique in that our climate ranges from temperate, to subtropical to tropical. Due to this distinctive climate gradient, not only is Florida one of the largest agricultural states in the country, but is also one of the most diversified by commodity. This wide range of diverse habitats and climate ranges magnifies the likelihood of any accidental exotic plant pest introduction becoming an established pest population and causing significant damage to Florida's \$120 billion dollar agricultural industry.

Current systems approaches and phytosanitary practices for fruit fly host commodities have been effective at preventing costly exotic fruit fly programs for U.S. agriculture. Maintaining fruit fly monitoring procedures, exclusion techniques and cold treatment at the point of origin or in route to the United States allows for a reduced risk of potential entry of fruit fly pests into Florida and the rest of the country. Even though the risk is reduced with the current cold treatment methodologies occurring at the port of origin or in route to the final destination, this process still poses a risk as seen earlier this year with live Mediterranean fruit fly larvae being found in clementine oranges from Morocco that arrived at the Port of Philadelphia. This is not the first occasion where cold treatment has failed. Because of well-documented cases such as the one mentioned above and future potential for cold treatment failure, the threat is too high for states that grow commodities at risk for Mediterranean fruit fly and other exotic fruit fly introductions. Shipments of non-treated fruit fly host commodities from locations known to harbor fruit fly populations should not be allowed entry into Florida or to ports south of 39° latitude and west of 104° longitude. Regardless of the quality of the proposed treatment facilities, treatment at destination would pose an even greater and unnecessary risk to Florida's agriculture where active eradication of Mediterranean fruit fly or any other serious economically important pest could cost millions of dollars in crop loss and prove to be disastrous to international trade.

An accidental/incidental introduction of any of these fruit fly species could be catastrophic not only to Florida's agricultural industry but a good portion of the southern US. As an example, Florida currently maintains an active and robust fruit fly trapping program with 55,000 traps being placed throughout the state. Florida also releases approximately 80,000,000 sterile Mediterranean fruit flies on a weekly basis to help prevent possible establishment of this fruit fly species. Although these safeguarding protocols are present in Florida, an accidental incursion of Mediterranean fruit fly did occur in 2010 and again in 2011 which elicited an emergency program in each case that cost approximately \$4 million to achieve eradication.

In addition to the Mediterranean fruit fly, there are additional pests that could accompany commodities destined for Florida and the United States where cold treatment might not be an effective means of

preventing introduction. This would include *Bactrocera* fruit fly species, *Spodoptera littoralis*, *Helicoverpa armigera*, *Cryptoblabes gnidiella*, *Gymnandrosoma aurantianum*, *Chrysodeixes chalcites*, *Brevipalpus* mite species (that could harbor citrus leprosis) and fungal plant pathogens. Each of these pests has a wide host range of economically important crops and would have a severe impact on Florida agriculture. If any of these quarantinable pests are accidentally introduced it would result in costly eradication efforts in those rare instances where eradication is even possible.

In recent years, FDACS has spent millions eradicating pests and diseases introduced through multiple pathways. Citrus canker and citrus greening have seriously compromised the industry and efforts to manage these diseases continues to require millions of federal and state dollars to ensure shipment of certified disease-free fruit. Impacts from diseases have contributed significantly to the reduction in Florida orange production from 257 million boxes in 1997 to 80 million in 2016.

In February 2016, after a six-month eradication program, the state declared eradication of the Oriental fruit fly from a predominantly agricultural area of Miami-Dade County. The program cost state and federal agencies over \$6 million and millions more in lost revenue to the agricultural industry. Without the immediate response of state and federal agricultural agencies and the cooperation of industry, agricultural organizations, and the public, the Oriental fruit fly infestation could have spread rapidly and had an even more adverse impact on Florida agriculture.

Another program that demonstrates the state's need to maintain robust pest exclusion programs is the Giant African Land Snail Eradication Program underway in Miami-Dade and Broward Counties. Over 160,000 snails have been collected since the program began in September of 2011. State and federal funds spent to eradicate this devastating pest have exceeded \$17 million. While expended resources are being reduced as fewer and fewer snails are collected, millions of additional dollars will be spent over the next few years until eradication is declared.

Finally, laurel wilt, a disease vectored by the redbay ambrosia beetle, has hit Florida's avocado industry hard, and has decimated trees in the laurel family including redbay trees throughout the southeast. Enhanced vigilance and strict import requirements must remain our department's top priority towards achieving our mission of protecting Florida's native and commercially grown plants and the state's apiary industry from harmful pests and disease.

FDACS-DPI agrees with the fruit cutting and inspection revisions for pests other than Mediterranean fruit fly.

FDACS-DPI agrees with adding requirements concerning the establishment of compliance agreements for all entities that operate fumigation facilities.

FDACS-DPI supports the harmonization of language for irradiation treatment and fumigation treatment regulations.

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