



Healthy Plants • Healthy World

July 17, 2003

Mr. Ray Nosbaum
Senior Regulatory Coordinator
PPQ, APHIS
4700 River Road Unit 131
Riverdale, MD 20737

Dear Mr. Nosbaum:

The American Phytopathological Society (APS), founded in 1909, is the premiere educational, professional and scientific society dedicated to the promotion of plant health and plant disease management for the common good. The Society, representing the interest of five thousand scientists whose pivotal research advances in the understanding of the science of plant pathology and its application to plant health, respectfully submits its comments regarding the proposed "Guidelines for Regulating Wood Packaging Material in International Trade" (Federal Register, May 20, 2003 (Volume 68, Number 97, Pages 27480-27491; Docket No. 02-032-2)

The APS reiterates its opinions on wood importation previously distributed in 1999 (provided below) as a minimum approach to protect our urban trees, the horticultural industry, other tree-associated industries and the forests and woodlands of the United States from exotic pests and pathogens that enter this country via solid wood packaging material (SWPM). Although adoption of the International Plant Protection Convention guidelines would be an improvement over an absence of standards, there is no substantive body of scientific information that provides assurance that practices called for in these standards will eliminate the risk of introduction of dangerous tree pathogens into North American forests and urban settings. Effective regulation of SWPM could eliminate SWPM as one of the avenues of pest introduction into our country. Even more effective would be the use of non-solid wood materials for shipping, which we hope is a goal of APHIS. We also have concern that standards are lacking for loose wood packing materials (e.g., wood shavings) and composite materials that also may harbor tree pathogens and serve as a means of their introduction, and for exemption of Department of Defense materials. Hence, we urge adoption of the treatment standard included in our January 1999 statement <http://www.apsnet.org/media/ps/woodimport.asp> as a minimum standard. In addition, we recommend that research be supported to develop standards based on scientific information that will assure that SWPM are not a continued source of entry of pests into our country, or that alternatives to SWPM be developed.

The APS appreciates the opportunity to provide comment on this issue. Protecting our urban and forest trees should be given every consideration and a high priority.

Sincerely,

Jacqueline Fletcher
APS President