



United States
Department of
Agriculture

Animal and Plant
Health Inspection
Service

Washington, DC
20250

July 15, 2011

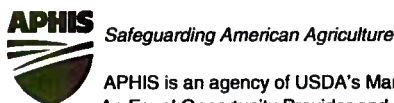
Dear Valued Stakeholders:

APHIS recognizes the importance of America's forests and we are committed to protecting this critical resource from invasive plant pests. Wood packaging materials (WPM), including pallets, crating, dunnage, wooden cable spools, and other similar items, have been identified as a high risk pathway for the international movement of a variety of invasive pests that attack trees and other woody plants. To address this important pathway, APHIS adopted regulations in 2005 that require all WPM entering the United States meet the International Plant Protection Convention's ISPM 15 standards. APHIS took a number of steps to better understand the issue, as well as the economic and environmental impacts of pursuing a domestic regulation.

In 2009, APHIS published an Advance Notice of Proposed Rulemaking (ANPR) and held a series of four public meetings at multiple locations across the country. We received strong public response to the ANPR and at the meetings, with 94 parties providing hundreds of pages of comments. Respondents included private citizens, members of the WPM industry, supporting industries and organizations, members of the forest products industry, state regulatory and natural resource agencies, conservation groups, and organizations representing groups of pallet and other WPM users. While a significant number of parties, including some representatives of the WPM industry, support the implementation of a national treatment standard and regulations, others raised important questions regarding associated costs and the lack of data and direct evidence to demonstrate that pests can be moved domestically via the WPM pathway.

In 2011, APHIS prepared a Pathway Risk Assessment (PRA) to analyze the risk associated with the movement of WPM in the domestic commerce stream. The PRA is available on the APHIS Website at http://www.aphis.usda.gov/plant_health/plant_pest_info/downloads/RiskAssessment-WPM.pdf.

The findings of the PRA echo the information gathered through the ANPR process and the public meetings. While the domestic movement of WPM is potentially a suitable vector for human-assisted spread of a variety of exotic invasive pests, we lack the evidence and data to support this conclusion. The PRA also identifies the lack of a single point in WPM production, distribution, and movement chain at which we could apply regulatory controls that would address the range of pest risks potentially associated with domestic WPM. Further, the PRA recognizes that with ISPM-15 standards, as well as our forest pest specific quarantines that are enforced domestically; we have safeguards in place to address the movement of wood products and pallets.

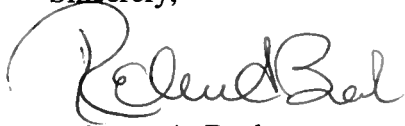


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Because the pest risks cannot be demonstrated with certainty, any regulatory scheme to mitigate the pathway would be complex and limited in its effectiveness. Also, the costs and other burdens and impacts of regulations would be significant. For these reasons, we will not pursue the development of regulations at this time. We will, however, continue to work to more fully understand the risks posed by domestic WPM. And we will work closely with the WPM industry and our other private and public sector partners to identify strategies and tools that can effectively prevent pests from being moved on this pathway.

Sincerely,

A handwritten signature in black ink, appearing to read "Rebecca A. Bech". The signature is fluid and cursive, with a large initial "R" and "B".

Rebecca A. Bech
Deputy Administrator
Plant Protection and Quarantine