



Healthy Plants • Healthy World

January 31, 2011

Julie E. Aliaga
International Phytosanitary Standards Program Director
USDA APHIS PPQ
4700 River Road, Riverdale MD 20737

Dear Ms. Aliaga,

The American Phytopathological Society – Public Policy Board (APS PPB) supports the development of International Standards for Phytosanitary Measures (ISPM) to govern the international movement of seed. Seed movement is one of many pathways in which pests and diseases can be disseminated and introduced to new regions. International standards specific to seed movement are needed to consistently mitigate the impact of potential seedborne and seed transmitted pests and pathogens.

The specifications recently drafted by the International Plant Protection Convention (IPPC) standards committee will define the scope and content of the ISPM. It is important that these specifications be science based, encompass needs of the international seed industry and consider the risk via seed movement within the context of all modes of pest and pathogen movement and introduction.

It will be critical to include the following issues of importance to the international seed industry in the development of an IPPC ISPM:

- Guidance on seed re-exports
- Guidance on the international movement of seed intended for pre-commercial purposes (plant breeding, research, etc.)
- Consensus on the definitions of seed borne and seed transmitted pathogens
- Guidance on pathway analysis procedures used in pest risk assessments (considering all sources of pest and pathogen introduction)
- Need for harmonized phytosanitary measures for seed pests for the purpose of phytosanitary certification
- Guidance on phytosanitary certification and inspection of pellet or film coated seed
- Guidance on determining length of validity of phytosanitary certificated for seed stored for extended periods prior to export.

Thank you for the opportunity to comment on the proposed specifications to be used in the development of the ISPM.

Sincerely,

Jan E. Leach
Chair, American Phytopathological Society Public Policy Board

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