

Kaitlin Crawford

From: Martha Malapi
Sent: Tuesday, January 16, 2024 3:38 PM
To: Kaitlin Crawford
Cc: Libby Hogen-Heath
Subject: FW: ASTA's Comments: Phytosanitary requirements for importing vegetable seeds

Follow Up Flag: Follow up
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Hi Katie,

Below is the email I sent to the Ministry of Agriculture of Jordan.

Thanks!
MM

Martha Malapi, Ph.D.
Director, Seed Health and Trade
American Seed Trade Association (ASTA)
Ph: 703-837-8140 x 339 / 571-329-0269 (cell)

From: Martha Malapi
Sent: Friday, December 15, 2023 3:35 PM
To: 'm.hiary@moa.gov.jo' <m.hiary@moa.gov.jo>; 'agreements@moa.gov.jo' <agreements@moa.gov.jo>; 'intcopmoa@moa.gov.jo' <intcopmoa@moa.gov.jo>
Cc: 'Mohamed.sedegui@usda.gov' <Mohamed.sedegui@usda.gov>; 'Hebbar, Prakash - MRP-APHIS' <prakash.hebbar@usda.gov>; 'Hintz, Charles - TFAA-FAS, DC' <Charles.Hintz@usda.gov>; Sam Crowell <scrowell@betterseed.org>; Fan-Li Chou <FLChou@betterseed.org>; mmalapi@betterseed.org
Subject: ASTA's Comments: Phytosanitary requirements for importing vegetable seeds

Dear Mr. Mohammed Hiary,

Directorate of Agreements and International Cooperation Department

Ministry of Agriculture of Jordan

I trust this email finds you well. My name is Dr. Martha Malapi, and I am writing on behalf of the American Seed Trade Association (ASTA). Founded in 1883, ASTA is one of the oldest trade organizations in the United States. Its membership consists of close to 700 companies involved in North America seed production and distribution, plant breeding, and related industries.

We have carefully reviewed the WTO notification G/SPS/N/JOR/43, dated 17 October 2023, from Jordan. After thorough consideration, we would like to submit our comments and observations for your review:

Transition period for implementation:

We respectfully request an appropriate transitional period of 12 months before the requirements come into force. This will allow the U.S. seed industry and NPPO time to ensure that seed already harvested can comply with these requirements in time for planting.

Pests for which seed pathway is not proven:

We want to point out that a few pathogens included in this notification have not been proven to be seed transmitted—as referenced in the International Seed Federation’s Pest List, which is recognized as an authority on the topic by the ISPM 38 International movement of seeds. Most studies for these pathogens were performed under experimental conditions and do not provide information about ‘seed as a pathway’ under natural conditions. Section 1.2 of ISPM 38 states that “*The PRA should consider whether the transmission of pests has been observed or confirmed to occur under natural conditions or under experimental conditions (e.g. in a laboratory or a growth chamber). When the transmission of pests has been observed or confirmed under experimental conditions it is necessary to confirm that it can also occur under natural conditions*”.

List of pests for which seed pathway is not proven:

- *Clavibacter michiganensis subsp. michiganensis* for pepper
- *Tobacco streak virus* for tomato
- *Tomato black ring virus* for tomato
- *Squash mosaic virus* for watermelon
- *Tomato black ring virus* for eggplant and onion
- *Tobacco streak virus* for cucumber
- *Tobacco rattle virus* for onion
- *Tobacco necrosis virus* for tomato
- *Pepper mild mottle virus*. This virus does not infect tomatoes

Therefore, we respectfully request these pathogens to be removed from regulation.

Thank you for your consideration of our comments. Our team is available for any additional information or to participate in any upcoming consultations related to this notification.

Kind regards,
Martha



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