

February 27, 2015

Ing. Rodrigo Astete Rocha  
División Protección Agrícola y Forestal  
Servicio Agrícola y Ganadero (SAG)  
Santiago, Chile

Dear Ing. Rodrigo Astete Rocha:

We are writing in relation to 'Resolución Exenta N°:1274/2015 Modifica Resolución N° 7.386 De 2014 Que Establece Requisitos Fitosanitarios Para La Importación De Semillas De Especies Hortícolas, Chacras, Aromáticas Y Medicinales, Procedentes De Todo Origen' published on February 19, 2015. It is disappointing that SAG has published and implemented this resolution without country consultation. We still have several issues of concern that have not been addressed by SAG as follows:

- The pests *Callosobruchus maculatus*, *Zabrotes subfasciatus*, and *Ascochyta rabiei* should be removed from the pest list as these are present in Chile.
- We request adherence to adopted international standards in identifying pests of concern to the species level. The inclusion of *Bruchus* spp. is against adopted standards as there are several species within this family already present in Chile. We request that SAG identify to species level those that follow the pathway.
- The *Potato spindle tuber viroid* (PSTVd) should be removed from the pest list as this pest has been eradicated in the United States and APHIS considers it a pest of quarantine significance.
- The *Arracacha virus B* should be removed from the pest list as is not present in the United States and APHIS considers it a pest of quarantine significance.
- We request that SAG provides the option to treat and release the consignment, in addition to the options to reject, re-export, or destroy, in the event of a pest interception.
- We request clarification as to the application of the additional declaration (AD) for seeds that have been harvested during a previous season 'Consignment originated from a nursery that was inspected during the active growth period and found free of (name of the bacterium)', which can be used until December 31, 2015. Please note that mother plants may not be available for an inspection.
- We request a transition period for seeds that will be shipped in calendar year 2015 that were produced and harvested before this season. As written in the published resolution, these seeds will require a field inspection and laboratory testing of mother plants for determination of pest freedom which will be impossible to meet.
- We respectfully request a copy of the pest risk analysis performed in which SAG identified the risk of the pests for which field inspection and analysis are required during the active growth period, and the pest risk rating that justifies two separate requirements in relation to the mother plant material.
- Laboratory testing of plant material that is not showing symptoms of pest presence is not technically justified. We propose instead, that if symptoms of the pest of concern are

noted during the field inspection of mother-plants during active growth, that laboratory analysis be conducted to determine pest freedom. Alternatively, harvested seed could be treated or tested by laboratory analysis for the particular pest of concern.

- We request clarification from SAG as to when diagnostic tests are to be performed to meet the AD for the pathogens identified, that is, if it should be performed during active growth, on harvested seed, or either option.
- We request clarification as to what constitutes a laboratory analysis and if microscopic examination in the laboratory qualifies as an analysis.

We respectfully request the opportunity for a bilateral consultation to discuss our concerns. We propose a teleconference between SAG and APHIS to be held during the week of March 9, 2015 to this end. Please let us know if this possible and we will make arrangements through our International Services office in Santiago, Chile.

We look forward to receiving your prompt response.

Sincerely,

Alan K. Dowdy, Ph.D.  
Assistant Deputy Administrator  
Phytosanitary Issues Management  
Office of the Deputy Administrator  
Plant Protection and Quarantine

cc:

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