



Washington State Tree Fruit Association

105 S. 18th Street, Suite 116 - Yakima, WA 98901 - 509-452-8555

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Jim Marra, Ph.D.,
WSDA Pest Program Manager
PO Box 42560
Olympia, WA 98504-2560

Dear Dr. Marra:

Thank you for the opportunity to provide comments on the proposed amendment to the apple maggot quarantine regulation which would add potted trees to the list of regulated commodities.

The Washington State Tree Fruit Association represents growers, packers, and marketers of apples, pears, cherries, and other tree fruit. The tree fruit industry is concerned with maintaining protection against apple maggot (AM) infestation. Failure to control the spread of AM would require growers to increase costly pesticide applications in the orchard to prevent crop loss. Lack of adequate control also jeopardizes access to foreign markets concerned about this pest.

WSDA staff have identified potted nursery trees as a potential pathway for the introduction of apple maggot. While AM has been shown to pupate in 'soils' such as a potting mix made of bark, peat, pumice, sand, etc., AM can also likely pupate in almost any other type of potting media. Potted trees may have previously fruited or have fruit present, which may be likely infested. AM host trees shipped from areas where AM occurs and which have fruited or are fruiting could result in AM pupating in the potting media. If these trees are then moved to AM-free areas, an unacceptable pathway has been created. While specific mitigation measures should be determined by WSDA after scientific review, it is important that this pathway (soils and trees) for movement and introduction of AM be addressed.

We believe that by implementing reasonable cautions and protective standards, the goal of preventing AM from infesting fruit in AM-free areas of Washington can be achieved. We strongly urge WSDA to move forward with the addition of soils and AM-host trees to the list of regulated commodities under the AM quarantine rule.

Thank you for the opportunity to express our members' concerns.

Sincerely,

Ranie L. Haas
Director of Regulatory and Industry Affairs