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August 8, 2016

U.S. Department of Agriculture  
Regulatory Analysis and Development  
PPD, Animal and Plant Health Inspection Service  
4700 River Road, Unit 118  
Riverdale, MD 20737-1238

**Re: Docket No. APHIS 2015-0004 Importation of Fresh Lemon (*Citrus limon* (L.) Burm.f) from Northwest Argentina into the Continental United States.**

The National Plant Board (NPB) is an organization of all U.S. state plant regulatory agencies working together to help ensure a wholesome and abundant supply of agricultural commodities. A significant component of that responsibility includes excluding, eradicating, and managing exotic pests that threaten the American food supply and protecting our critical Natural Resources.

This docket was circulated to the NPB membership for review and comment. Generally, the NPB is supportive of systems approach methodology to manage pests of regulatory significance. However, the Risk Management Document for this proposal identifies the pest risk potential for *Brevipalpus chilensis* mite and three insects (*Ceratitidis capitata*, *Cryptoblables gnidiella*, and *Gymnandrosoma aurantianum*) as high. Additionally, the pest risk potential for three other mites (*Breviapalpus californicus*, *B.obovatus*, and *B. phoenicus*), the fungus (*Elsoinoe australis*) and the bacterium (*Xanthomonas citri*) are rated as medium for introduction. NPB members from the citrus growing states of the U.S. have expressed grave concerns about the level of enforcement and phytosanitary effectiveness of this of this systems approach to eliminate the risk of introduction of these nine significance quarantine pests. This concern is based on the exotic pest conducive environment of their states that places a high risk of infestation on their broad range of fruit and vegetable crops. Likewise, this risk of introduction into the highly sensitive fruit productions areas of this country, places other crops and the U. S. food supply at risk. Therefore, the NPB opposes this proposal to amend the fruit and vegetable regulations to allow for the importation of lemons (*Citrus limon*) from Northwest Argentina into the Continental U. S.

We appreciate the opportunity to review and comment on this proposed amendment to the fruit and vegetable regulations. The NPB is willing to review alternative phytosanitary measures that may better mitigate the risk of infestation of these quarantine pests. Please feel free to contact me if you have questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joe Collins', written in a cursive style.

Joe Collins, President  
National Plant Board