Ministerie van Landbouw, Natuur en Voedselkwaliteit

Ministry of Agriculture, Nature and Food Quality

United States Department of Agriculture
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landbouw, natuur en voedselkwaliteit

Your letter of	your reference	our reference	date
		TPD/2004/2973	16-06-2004
re:		extension no.	enclosures
Docket No. 03-019-2		+31 317 496 653	1

Dear Mr. Burnett,

Reference is made to Docket No. 03-019-2 – Certification Program for Imported Articles of *Pelargonium* spp. and *Solanum* spp. to prevent introduction of potato brown rot, as sent to USDA/APHIS stakeholders on April 27, 2004.

The information submitted is studied by Dutch phytosanitary specialists, supported by their Belgian and German colleagues; the comments noted in the annex to this letter, are the result of the joint effort.

It is appreciated to be informed timely giving the trading partners the opportunity to share any comment.

As APHIS has indicated that several difficulties have been encountered after the introduction of the interim rule of May 2003, would you be so kind to share information on the extent of the difficulties encountered.
It could well be that EU-member states could share more profound information resulting in US-regulations which take the EU situation more into consideration.

As a general comment on the proposed certification program we have noted from the document that the requirements are focussed on the concept of pest free production sites. We are of the opinion that US should also take into account the concept of pest free areas, enabling producing countries to apply this concept.

Furthermore no information could be retrieved from the document on official control within the US-territory, knowing the disease to be present in certain parts of the US as stated on page 21942.

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I would very much welcome information on this particular aspect.

Furthermore the emphasis of the proposed certification program is to prevent the use of contaminated water or the prevent contaminated water from entering the production facility.
It seems that production practices as applied in countries like Belgium, Germany and the Netherlands are not taken into consideration while adjusting the May 2003 interim rule or that production practices are not familiar to US.

At least for the Netherlands, producers (greenhouse production) do not use surface water for neither spraying nor irrigating the plants. As a source rain water, tap water or water from deep wells is used.

With regard to the observation that testing upon entry is not possible, we are of the opinion that it is very well possible to test for presence of *Ralstonia solanacearum* at entry by good methods or post entry inspections on the nurseries where the cuttings are further cultivated, the latter practiced in Belgium and Germany.
With regard to the Netherlands, systematic surveys in *Pelargonium* production are conducted till to date the survey did not reveal an infestation with potato brown rot
For potato testing is commonly practiced at entry in EU as explained in Washington.

Positive screening tests, which will be only a few, can always be further diagnosed up to race/biovar level. It is however recognized that due to extremely low incidence of disease normally present when infection has taken place, the measures on nurseries are more important then testing and should make testing superfluous.

We suggest therefore to take the above mentioned observations into consideration.

I would welcome initiatives of US which take the production practices as applied in e.g. the Netherlands into consideration.
As APHIS representatives are present in Europe, responding countries are willing to demonstrate the production practices and the safeguards implemented on nursery level as applied by producers.

During the visit of Dr. Dunckle c.s. to the Netherlands the end of May we would be in the position to pay attention to this particular aspect

The overall opinion regarding the proposed Certification Program is that no phytopathological/epidemiological/ecological basis exist to justify the additional certification scheme, trust funds, extensive and costly testings, which also must include approval of water sources and growing medium, and prescribed use of tests (field kits that are only applicable for plants with symptoms, ELISA and PCR).

I sincerely hope that the comments will have a constructive contribution to the final text of the certification program.

Should you need further information, please do not hesitate to contact me.

Sincerely yours,

Ir. N.A. van Opstal
Deputy Director

Comments to Docket No. 03-019-2 – Certification Program for imported articles of *Pelargonium* spp. and *Solanum* spp. to prevent introduction of potato brown rot as present by APHIS by through the April 27, 2004 letter to their stakeholders.

Considerations supported by J.D. Janse (PPS Wageningen, NL), P. Mueller (BBA Kleinmachnow, DE) and J. van Vaerenbergh (CLO, Merelbeke, BE).

1. *Ralstonia solanacearum* biovar 2, race 3 is known not to occur in *Pelargonium* nurseries in some member states of the EU and not known to occur in *Pelargonium* nurseries in other member states of the EU.
   This implies the eradication since 2000 of introductions from Kenya as demonstrated through relevant monitoring programs in Member states concerned, (BE, DE, NL and to a lesser extent in the UK).
   This situation should be known by APHIS since results of these surveys were presented in contributions by J. Elphinstone and J. Janse at a special meeting on this topic organized by APHIS in June 2003 in the US.

2. The spread from field to field by run-off water has never been substantiated to our knowledge in Europe. Establishment in bittersweet (*Solanum dulcamara)* and subsequent irrigation with contaminated surface water is of much more importance.

   It is noted from the Docket that in the production of *Pelargonium* and *Solanum* the ebb and flow system may not be used.
   This production system is quite common at least in Germany and the Netherlands.

   Prohibiting the ebb and flow systems in an environment where the disease does not occur is not considered to be a justified requirement.

   APHIS is therefore encouraged to share the rationale on prohibiting the ebb and flow system; furthermore APHIS is requested to accept the ebb and flow system in areas where the disease is known not to occur.

3. In the entire document it is assumed as if the disease were present in any material produced in a country where the disease is known to occur; a distinction however should be made for protected cultivation in greenhouses at least, where already strict production practices are applied to avoid disease from entering the production.
   As indicated before US should also include the option of pest free areas.

4. It seems that US is given excessive importance to the economic effect of the disease on the crops for Northern USA, both for *Pelargonium* and *Solanum* and therefore also for Nothern Europe.
   In cooler climates however the disease rarely results in substantial yield losses in potato and under a proper control program it occurs only sporadically and can be

eliminated from the production column as has been shown in Sweden. Status according to CPC 2003, absent, eradicated.

Pelargonium however is not a preferential host for *Ralstonia solanacearum* and crop losses have been shown minimal and easily eliminated by proper cultural practices.

There is still apparent confusion in the document of APHIS about race 1 biovars, 1, 3, 4 (being the tropical race with a broad host range that also occurs in southern USA and for which apparently no measures are in place) and race 3, biovar 2 (being the race of cooler climates with a narrow host range) for which there are indications that it already occurred in *Pelargonium* in the US before 1999:

- In a finding in 1979 of a strain of *Ralstonia solanacearum* from *Pelargonium x hortorum (= P. zonale* hybrids or better Geranium) in the US, race and biovar identification was unclear but pathogenicity tests showed that the isolates from *Pelargonium* failed to cause disease on tobacco, which is typical for race 3, biovar 2 (Strider, D.L., Jones, R.K., and Haygood, R.A. 1981. Southern bacterial wilt of geranium caused by *Pseudomonas solanacearum. Plant Disease* **65**: 52-53).
- More recently biovar 2, race 3 was diagnosed from *Pelargonium zonale* in Wisconsin (Hudelson, B.D. 1999. Southern wilt. *University of Wisconsin Garden Facts,* May 11, 1999.
- The bacterium was also reported in *P. zonale* from Ohio (Nameth, S. 1999. Bacterial disease alert in geraniums. FlowerTECH2, no. 4: 65-67.) and Pennsylvania *Plant Pest Report* **16**, no. 4) in the US. In these publications the race or biovar was not identified or reported, but there are indications that biovar 1, race 1 was involved. Race 1 has a much broader host range and is of more importance for crops both grown outdoors and in greenhouses.
  From that perspective one could say that basic material from US could be a threat for Europe.

  US is encouraged to comment on the above mentioned observations.

5. It is observed that no extra measures are taken against race 1, the tropical race, although this race is pathogenic to *Pelargonium* as well.

6. *Solanum nigrum* does not play an important role (as annual plant) in survival of *Ralstonia solanacearum* in regions with periods of frost, but could play a role for spreading during the growing season.
   However under protected cultivation in greenhouses *Solanum nigrum* is not relevant since production of plants is mainly done on either raised benches or on total concrete floors.