

To Whom It May Concern,

As a co-author of the LBAM Reclassification petition that was submitted to USDA, I am hoping that you will not only rely on the review and bibliography provided by USDA. I received the bibliography that was presumably submitted for your review and seminal documents and communications from experts worldwide that we provided to USDA were omitted, as was our petition itself. The petition we prepared proved an in-depth review of the published scientific literature on LBAM over the last 100 years, detailed communications with experts in Australia, Hawaii, New Zealand, and the United Kingdom, and reviews of agriculture management policies in Australia and New Zealand regarding LBAM. One significant limitation with the currently published literature is that there have been very few scientific publications on LBAM after 2000. Pre-2000 literature reflects the management of LBAM in the face of broad spectrum scheduled organophosphate use. This resulted in LBAM becoming a pest of greater economic significance as predators that normally keep LBAM in check were eliminated. Based on new requirements of USDA regarding organophosphate (OPs) residues on imports, both Australia and especially New Zealand ceased the use of broad spectrum OPs. Entomologists and policy people within HortResearch have reported to us and to USDA that within 2 years of discontinuing OP use, natural predation became the primary control for LBAM and that only occasionally is there the need for some other biological control, such as insect growth regulators. And, those additional controls are only needed to in order to meet the USDA zero-tolerance LBAM requirement, not for reducing crop damage. Prior to the cessation of OP use, much research was directed to mating disruption and various control methods for LBAM. Because natural predation took over as the primary control, few papers have been published after 2000. Thus, only relying on pre-2000 literature reflects a level of concern for LBAM that was an artifact of OP use not the true level of threat posed by LBAM. Similarly, not having access to communications from experts in Hort Research and other regulatory organizations limits the current understanding of the true biological nature of LBAM. This information has been presented to USDA in writing and in a LBAM scientific symposium they sponsored last year. However, USDA never released any of the presentations and never developed a summary of findings from the scientific symposium. These presentations were similarly not provided for your review.

Throughout their LBAM history it appears that USDA has based their classification of LBAM on a limited subset of data and not the totality of data. The LBAM Reclassification Petition of Harder et al. provides a comprehensive review of the LBAM literature and the opinion of experts. I would like to present this directly to you if possible. Please let me know if this is possible. Should you desire further information please feel free to contact me: Roy Upton herbal@got.net (831-461-6317)