



California Forest Pest Council

Dedicated to protecting California's forests since 1951

www.caforestpestcouncil.org

August 18, 2016

Marina Zlotina
PPQ's IPPC Technical Director
International Phytosanitary Standards
4700 River Road, 5C-03.37
Riverdale, MD 20737

RE: USDA APHIS Draft International Phytosanitary Standards for Movement of Wood

Dear Ms. Zlotina:

The California Forest Pest Council (CFPC) is writing to express support for the USDA APHIS draft international phytosanitary standards for movement of wood. Council representatives submit these comments with the purpose of ensuring that technically sound and complete standards are in place that will minimize the risks of invasive species crossing international borders in wood products, with special interest paid to invasive species associated with the movement of contaminated firewood.

The wood movement standard provides guidance for the assessment of the pest risk of wood and describes phytosanitary measures which may be used to reduce the risk of introduction and spread of quarantine pests associated with the international movement of wood (particularly those that infest trees). With firewood being a primary pathway for invasive species spread, Council representatives request that firewood specifically be called out in conjunction with round wood on lines 50, 61, 69, 192, 201, 221, 231, 232, and 275 to highlight the risks associated with this commodity.

There are currently more than 450 non-native forest insects established in the US, most of which are wood- and phloem-boring insects that can be transported long distances in or on firewood. Invasive pests and diseases cost local governments approximately \$1.7 billion annually and result in \$830 million per year in residential property value loss, killing millions of trees nationwide.

In a survey of stores selling firewood in 18 states, 52% of the wood was from sources outside the state and 50% showed evidence of current or past insect infestations. In another study, 419 bundles of firewood were purchased from 4 states from 2007 – 2009. Live insects emerged from 47% of the firewood bundles over 18 months. ([J Econ Entomol.](#) 2012 Oct;105(5):1645-58.). An analysis of firewood entering California (Matthew Bokach, USFS) via the border stations found that 610 forest pests were intercepted coming from 38 other states, Canada, and Mexico.

The California Forest Pest Council was founded in 1951 and is a non-profit educational organization of over 800 public and private forest managers, researchers, foresters, entomologists, pathologists, biologists, and others interested in the health of California's forests and protection from damage caused by animals, diseases, insects, pollution, and weeds.



California Forest Pest Council

California Forest Pest Council

Dedicated to protecting California's forests since 1951

www.caforestpestcouncil.org

Firewood is a recognized primary pathway for tree and forest pests and diseases. As such, it should be treated with the utmost caution when being moved across international borders. Prevention is the most effective form of invasive species control. By assuring firewood transported and sold across international borders is free from harmful pests and diseases, we can enhance the protection of the economic and ecological value of US trees in urban, wildland, and agricultural settings.

We would be happy to answer any questions you may have. Thank you for your time and consideration of this request.

Sincerely,

Bob Rynearson
Chairman, California Forest Pest Council
bohr@wmbeaty.com

The California Forest Pest Council was founded in 1951 and is a non-profit educational organization of over 800 public and private forest managers, researchers, foresters, entomologists, pathologists, biologists, and others interested in the health of California's forests and protection from damage caused by animals, diseases, insects, pollution, and weeds.