



Animal and Plant  
Health Inspection  
Service (APHIS)

Plant Protection and  
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October 26, 2016

Dr. Hoang Trung, Director General  
Plant Protection Department (PPD)  
Ministry of Agriculture & Rural Development  
149 Ho Dac Dist. Dong Da District  
Hanoi, Viet Nam

Dear Dr. Trung:

We are writing in response to our October 18, 2016, teleconference, and we sincerely appreciate you ensuring the PPD staff was available to discuss a pilot program to use phosphine fumigation for U.S. Distillers Dried Grains (DDG). As a follow-up, we respectfully request PPD:

- Import U.S. Distillers Dried Grains (DDG) under a pilot fumigation program beyond the announced suspension date of December 17, 2016;
- Provide the report on pest detections in U.S. bulk grain, as well as any proposed change to the recently announced fumigation requirements, as soon as possible but before November 15, 2016; and
- Provide written confirmation that the dates of implementation for the announced methyl bromide requirement (December 1) and DDG suspension (December 17) refer to the Bill of Lading date.

Upon APHIS investigation of the interceptions, several items have been identified that may be associated with the presence of live insects. These include:

- The minimum fumigation duration requirement on phosphine product labels may not be long enough to adequately penetrate DDGs;
- Specific, limited circumstances exist under official oversight where inspection of containers prior to loading may not have occurred; and
- The absence of standard operating procedures for ensuring phytosanitary security of containers being aerated after fumigation—aeration is mandated by Federal law for containers carried on public roadways.

APHIS proposes the following measures to remedy these items:

- Extend the minimum phosphine fumigation duration by 24 hours for DDG;
- Ensure all containers are inspected under official oversight prior to loading; and
- Develop official safeguarding procedures for those containers aerated after fumigation.

As discussed during our October 18 teleconference, fumigation specialists within USDA-APHIS, the Agricultural Research Service, and the U.S. fumigation industry have concluded that phosphine, when the proposed measures are implemented, should effectively control infestation. Additionally, given phosphine fumigants' superior ability to penetrate dense material, our experts expect it to perform better than methyl bromide on DDG.

In response to Vietnam's concern that warehouses may be infested with storage pests, APHIS is working with U.S. industry on pest exclusion best management practices.

Please find below a calendar for the proposed DDG Pilot Fumigation Program. It involves additional investigation by APHIS, proposal of specific measures by APHIS, discussions with U.S. industry on those measures, and a trial period to determine efficacy of new measures as required by PPD during the October 18 discussion. Consequently, the calendar extends into the proposed suspension deadline, and for that reason, we would appreciate PPD's agreement to postpone that suspension while the new measures are being piloted as provided below.

**PROPOSED U.S. DISTILLERS DRIED GRAINS (DDG) PILOT FUMIGATION PROGRAM**

DATE	DETAILS
November 1-15	APHIS field team to Illinois DDG operations for fact finding And Vietnam provides report on pest detection in U.S. bulk grain
November 18	APHIS presents proposed requirements to U.S. industry
November 21	APHIS presents detailed action timeline to Vietnam, including modified phosphine treatment measures, safeguarding and update on the development of best management practices for DDG warehousing
December 17	First certification of DDG under modified phosphine treatment measures.
February 1	First container arrivals
April 1	Preliminary evaluation by PPD of effectiveness of modified measures shared with APHIS. If piloted fumigation is successful, no further changes necessary. If not, further action to be determined bilaterally.

Thank you again for meeting with us, and we look forward to receiving your favorable response.

Sincerely,



Andrea B. Simao  
Assistant Deputy Administrator  
Phytosanitary Issues Management  
Office of the Deputy Administrator