



Animal and Plant
Health Inspection
Service (APHIS)

Plant Protection and
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Dr. Hoang Trung
Director General
Plant Protection Department (PPD)
Ministry of Agriculture and Rural Development (MARD)
149 Ho Dac Di Street, Dong Da District
Hanoi, Vietnam

Dear Dr. Trung:

As agreed during our February 7-8, 2017 discussions in Hanoi, please find enclosed APHIS' investigation of U.S. dried distillers grains (DDG) consignments in which PPD detected live pests. The technical documentation is a complete analysis of the causal factors and the changes implemented by APHIS and the U.S. industry to remedy the situation.

The enclosed document was prepared in response to PPD's concern about live pest detections in U.S. DDG. APHIS' investigation of the non-compliant consignments consisted of the following: Origin trace back, site visit, interview, and a review of inspection policy, procedure, fumigation, and certification. APHIS determined that insect detections were almost entirely associated with containerized cargo, with only one documented detection in a consignment of bulk loaded product in ship's holds.

APHIS convened a panel of U.S. government and industry experts in phytosanitary treatments to evaluate treatment alternatives and the treatment schedules specific to DDG. Recommendations included:

- Use of phosphine;
- Use of separate policies and procedures based on conveyance (shipping container vs. bulk cargo);
- A more rigorous treatment schedule for DDG in containers
- An official stowage inspection of the container prior to loading;
- Placement of screening material over container vents and doors during aeration of fumigant;
- Use of a recirculation system for in transit fumigation of bulk loaded DDG in ship's holds; and,
- At the discretion of the shipper, continued use of methyl bromide as an alternative to the recommended phosphine treatment.

The enclosed technical documentation, Appendix 1, provides a discussion of the efficacy of phosphine and references numerous studies and trials that have been conducted demonstrating efficacy of phosphine fumigation of product in shipping

containers and bulk loaded into ship's holds. This documentation supports the recommended fumigation treatment schedule for DDG in shipping containers. This documentation supports the recommended fumigation treatment schedule for DDG in shipping containers. The recommended treatment schedule is as follows:

Phosphine Treatment Schedule, DDG in Shipping Containers for Vietnam

<u>Commodity Temperature °C</u>	<u>Commodity Temperature °F</u>	<u>Minimum PH3 Concentration</u>	<u>Minimum Exposure Period</u>
10-15	50-59	750 ppm	5 days
15-20	60-69	750 ppm	4 days
>20	>70	750 ppm	3 days

As discussed during the Hanoi meeting, APHIS continues to work with U.S. industry to promote pest management best practices at DDG warehouses and transload sites. APHIS and the U.S. industry are finalizing the BMPs which will be implemented prior to the proposed July 2017 visit.

We hope this technical report provides assurance as to the effectiveness of the current mitigation practices for U.S. DDGs. We look forward to receiving your favorable response so that we may finalize the dates of the verification visit to the United States.

Sincerely,



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