

Phone Call Memorandum

From: George Galasso

To: Files

Subj: DPP Pakistan Call, April 8, 2017 with DG Mr. Saeed Waseem ul Hassan and DG Muhammad Sohail Shahzad.

Date: Apr 8, 2017

Participants: George Galasso, Lottie Erikson, Sharon Williams, Mike Guidici Pietro, Viondette Lopez, Allen Dawson, Maggie Smither,

Action Items –

1. PIM committed to provide assistance to Pakistan for the development of PRAs, focused first on soybeans.
2. PIM to send detailed description of DDG processing (send for soy meal as well).
3. PIM to send references on the Corn Flea Beetle.
4. PIM to ascertain use of soybeans in Pakistan.
5. Export Services to note ship hold numbers in comments block of treatment section on PC.
6. DPP will provide letter listing which products for which import permit need be provided prior to export certification.
7. DPP will provide letter confirming that if grain not devitalized prior to shipment, it will be fumigated with MB and subject to lab testing upon arrival.
8. Lottie Erikson to followup with DPP on shipment information on held Pakistani rice

Discussion-

Pakistan:

- Started with the need to balance plant health and avoidance of trade disruption.
- Expressed concern that US PCs were not consistent with import permits, sometimes because import permits were not issued. Import permits were reported to be required for all major grains and grain products (and most agricultural products).
- Specifically complained about cockle bur (*Xanthium* sp.), stating that it is noticeable along major transportation routes, indicative of spillage from grain transports. Pakistan specified that they have purchased glyphosate from China for a national cockle bur control program.
- Emphasized the need to devitalize weed seeds in grain shipments. The implications for animal health was also raised; 500 cockle bur seeds claimed to be toxic to a 40 pound animal.
- Stated that it was in the process of conducting pest risk assessments for multiple grains and grain products, and sought US assistance to do so. They requested US sponsorship of US travel for a risk assessment team.

U.S.:

- Referenced letter of April 6, 2017 (U.S. DDG & soymeal) arguing against disease (ex. Stewart's wilt) testing and certification given the high processing temperatures, and in the case of DDGs, fermentation and high acidity.
- Referenced letter of March 9, 2017 (U.S. soybean) arguing against freedom from *Xanthium strumarium*, corn and lentils in US soybean shipments since *X. strumarium* was already widespread in Pakistan, but more importantly, the soybeans were going to destructive processing.
- Explained the impracticality of fumigating containers in the interior, arguing against mandatory fumigation of pulses prior to arrival in Pakistan. Asked for import conditions for U.S. chick peas.
- Explained that methyl bromide fumigation and otherwise devitalizing bulk grain (heating, splitting, etc.) was explained as impractical.
- Offered to extend support for a soybean PRA, suggesting that it would be best to focus on one grain at a time. Left open the possibility of some funding support for a U.S. visit, but that it needed to be linked to the PRA process.

The U.S. emphasized that any new import requirements, including mitigation measures, should not be implemented before Pakistan's completion of the proposed pest risk assessments (PRA), including a pest management analysis in which measures are technically justified. The U.S. also explained that grain for consumption has not been demonstrated to have been the pathway for quarantine pest establishment and spread, and as such, the U.S. did not offer specific disease or weed seed freedom certification. It further explained that complete freedom from foreign material, such as corn and lentils, was impossible. Pakistan doubled down on *X. strumarium*, citing their recent efforts at eradication, and explained that they were required by law to prohibit any foreign product other than the declared product. Pakistan did express some willingness to reconsider its position on disease certification for DDGs, asking for processing details, and they expressed an interest in visiting the U.S. to further investigate risk from soybeans, DDG, and soymeal. Pakistan also requested, and the U.S. agreed, that export certification only be provided after import permits were presented.

Associate Director Guidici Pietro April 8, 2017 Report to Deputy Administrator Osama El Lissy:

On Apr 8, 2017, at 7:11 AM, Guidici Pietro, Michael A - APHIS <Michael.A.Guidici Pietro@aphis.usda.gov> wrote:

Osamawe (PIM and IS) had a 2 hour call with DPP, Pakistan this morning. We thanked them several times for agreeing to have such a call at 8:00 to 10:00 pm Pakistan time. Both their DG Mr. Saeed Waseem ul Hassan and DG Muhammad Sohail Shahzad were in attendance.

Andrea has sent you our most recent letter regarding their apparent concern over the potential for Stewart's wilt being in DDG shipments. They wanted testing of each shipment for the bacteria. After much back and forth I believe they may be rethinking their position after we went over the process that

DDGs go through. We committed to provide a processing flow chart showing the DDG process along with time/temp information as well as high acidity. We need to also get them off wanting such treatments on the Phyto and are hoping if necessary an industry certificate of processing as above could accompany the Phyto.

We also talked about their interception of *Xanthium strumarium* (cocklebur) in shipments of corn, lentils and soybeans. We discussed the fact all of the shipments are going for further processing and that complete freedom or devitalization of *Xanthium* is not possible. They do have this species but apparently are trying to avoid spillage in transit to processing facilities. They then suggested using MB as a phosphine alternative and George explained why that too was problematic.

We now know, and are changing PExD to state that no PC is to be issued without a Pakistani IP as required by DPP. Previously we were not requiring IPs to be presented and DPP thanked us for the change in policy.

So, while this is still very much a work in progress, I got the impression they want to work with us to keep trade moving. They do have some regulations that may prove problematic for us and I expect all grain will need to be fumigated in transit with phosphine. We will be following up with a letter to DPP on DDG processing and some information on the vector of Stewart's wilt.

Mike

Galasso email to CFIA -

Fri 4/7/2017 3:51 PM

Galasso, George J - APHIS <George.Galasso@aphis.usda.gov>

RE: How did your call with Pakistan's DG turn out?

To: 'Jason Murphy' <Jason.Murphy@inspection.gc.ca>

Jason:

The call went fairly well, with DPP showing some flexibility. We only touched briefly on pulses, explaining to DPP why it was impractical to fumigate containers in winter. We asked why they just can't fumigate upon arrival if they find live pests, and they did not have a response.

Our main concern was the rumored May 1 deadline, by which they were going to refuse entry if weed seeds present. The deadline never came up, the sense of the discussion was how to move forward on a PRA to determine mitigation measures. They appeared to be content with the offer of assistance on a PRA, and if weed seeds detected, would continue to fumigate with MB and supervise processing in lieu

of refusal of entry. We talked about the import permit requiring to specify freedom from Stewarts wilt in DDG on the PC, and they agreed it would not be necessary, but they were still going to require lab testing upon arrival and if positive, fumigation with MB. Baby steps.

We talked about devitalization at origin. I explained how disease freedom certification was a nonstarter, and that to require devitalization would be tantamount to restricting imports to flour, DDG and soymeal. We got into a discussion about MB of bulk carriers at origin, and I explained it was simply not practiced due to Coast Guard regulation prohibiting in-transit, prohibiting fumigation while docked, and cost and safety considerations.

Lots of talk about diversion from intended use, spillage from conveyances, limited inspection resources, etc. They pointed out a need for PRAs for multiple grains, and we said we should focus on one at a time, and soybeans were a priority for US. They agreed that proscribed mitigations should follow completion of the risk management part of the PRAs, and asked for US sponsorship of a PRA team to the US to help speed things up.

That's about it.

Good luck with your call.

Regards,

George