



March 9, 2005

U.S. Department of Agriculture
Animal and Plant Health Inspection Service
Regulatory Analysis and Development
PPD, APHIS Station 3C71
4700 River Road, Unit 118
Riverdale, MD 20737-1238

Re: Docket No. 04-092-1

Dear APHIS:

I am writing on behalf of the American Spice Trade Association (ASTA), to support the proposed amendment to the Plant Protection and Quarantine Treatment Manual, *Phytophthora Ramorum*; Vacuum Heat Treatment for Bay Leaves, 70 Fed. Reg. 6596 (February 8, 2005). ASTA supports amending the regulations to allow leaves of California bay laurel (*Umbellularia californica*) to be treated with vacuum heat before being moved interstate.

ASTA was founded in 1907 and represents the interests of approximately 300 members including companies that grow, dehydrate, and process spices in the United States for domestic consumption and for export. ASTA's members include U.S.-based agents, brokers, and importers, companies based outside of the U.S. that grow spices and ship them to the U.S., and other companies associated with the U.S. spice industry. ASTA's members manufacture and market the vast majority of spices sold in the U.S. at retail, and to food processors. ASTA is active in research and education on spices, government relations, and trade relations.

Current regulations require that bay laurel be treated with a sustained hot water dip before it may be moved from the quarantine areas. This treatment is not a viable option for treating leaves from the California bay laurel because it ruins the leaves for their intended use as a dried spice. Research conducted by APHIS at the Center for Plant Health Science and Technology has demonstrated that vacuum heat treatment effectively eliminates *P.ramorum* on leaves of the California bay laurel. Therefore, ASTA supports amending the Plant Protection and Quarantine Treatment Manual to allow for this method.

We appreciate the opportunity to comment on this proposal. Please do not hesitate to contact us if we can provide additional information.

Sincerely,

Cheryl Deem
Executive Director