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February 27, 2009

Deputy Administrator Rebecca Bech  
Plant Protection Quarantine  
US Department of Agriculture  
Whitten Building  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Deputy Administrator Bech:

The Oregon Association of Nurseries (OAN) supported and advocated for Section 10201 of the 2008 Farm Bill in the effort to make substantial long-term gains to prevent the introduction and spread of plant pests and diseases. We reviewed with great interest USDA APHIS PPQ's plans for implementing Section 10201 of the 2008 Farm Bill, as described in the "2008 FARM BILL: Implementation Plan for Section 10201, *Plant Pest and Disease Management and Disaster Prevention*" (the Plan). We regret to state our disappointment with APHIS PPQ's stated plans.

The OAN worked closely with the Oregon congressional delegation, key congressional agriculture committee members and staff, and other stakeholders to ensure that nursery related provisions of Section 10201 were included in the Farm Bill. We understand Section 10201 as directing USDA to foster collaboration between APHIS, ARS, state plant health officials, researchers and the nursery industry to promote the development, test piloting and adoption of new approaches to plant pest and disease risk management.

To better meet the intent of Congress and serve the needs of industry we ask that you consider the following:

Foster collaboration. We strongly encourage USDA APHIS to pursue a plan to foster collaboration among interested stakeholders around implementation of the nursery provisions of Section 10201. We believe a national conference, bringing together industry organizations, growers, researchers, state and federal plant health officials, and other stakeholders is an essential first step toward implementation of Section 10201. A national conference will help ensure broad support for Section 10201 activities, and we urge APHIS PPQ to consider a conference modeled on the successful Citrus Greening Summit of December 2007.

Identify and prioritize nursery plant pests and diseases. Growers need new tools and processes to identify and prioritize plant pests and diseases; this is essential if growers are going to implement effective systems to address pests and diseases of concern. USDA should work with researchers, grower organizations and state plant health officials to develop the tools growers need to effectively assess and prioritize the most relevant pest and disease risks. And, we see a need for a better system of communication to individual state plant health officials, inspectors, grower

organizations and growers regarding potentially significant pest and disease risks that might originate from foreign sources.

Allocation of resources. The proposed experimental nursery in California to conduct research studies on *Phytophthora ramorum* (aka 'Sudden Oak Death') has significant value, but we don't believe it's appropriate to fund this nursery using Section 10201 money. The proposed mock nursery is focused on a single pathogen and would consume most of the available resources to support development of new systems of pest and disease risk management aimed at a broad spectrum of risks. Pests and diseases like Asian Longhorned Beetle, Emerald Ash Borer, Plum Pox Virus and Citrus Greening are examples of pests and pathogens that behave differently than *P. ramorum*. Section 10201 funds should be used to identify and support research to develop 'systems' that address a broad array of plant pest and disease risks that threaten our nation's nursery and greenhouse growers.

According to USDA staff, a California mock nursery is projected to cost \$994,383 in the first year to establish, and an additional \$1,111,131 to operate for years 2 – 5. Thus, consuming a substantial portion of the available funds under Section 10201.

Development of audit based nursery certification programs. The Plan proposes to channel Section 10201 funding toward established programs that are more narrowly focused than the broader based goals that gave rise to Section 10201. For example, the Plan places heavy emphasis on expanding existing programs of nursery certification to work in conjunction with the National Clean Plant Network (NCPN).

Both the US Nursery Certification Program (USNCP) and the NCPN represent valuable contributions in the fight against problem pests and diseases, but these programs cannot substitute for the basic discussion, collaboration, research and test-piloting necessary to allow widespread access by the nursery and greenhouse industry to new systems of pest and disease risk management.

We encourage USDA to emphasize programs of research, test-piloting and collaboration with the grower community, researchers and state plant health officials before committing to specific programs of audit-based certification. The outcome of collaborative discussions and research should guide the development of audit-based certification programs.

In our view, USDA's proposed strategies and activities as stated in the Plan depart from Congressional intent and fail to address the broader needs of industry, interested researchers and the goal of developing more effective exclusion, response and mitigation systems for plant pests and diseases.

Sincerely,

A handwritten signature in black ink, appearing to read "John Aguirre". The signature is stylized with a large, looping initial "J" and a long, sweeping underline.

John Aguirre  
Executive Director