



Healthy Plants • Healthy World

March 27, 2019

USDA REE

Subject: The American Phytopathological Society (APS) Comments in response to the request for comments for USDA Research, Education, and Economics Mission Area Farm Bill Listening Session (Federal Register Number 2019-05132 posted on Mar 19, 2019, Docket ID ARS-2019-0001)

The APS would like to submit the following comments on behalf of our society in response to the sections of the Farm Bill indicated below.

Matters related to NIFA:

- Section 12203. Agriculture and Food Defense; Section 12203c. **National Plant Diagnostic Network (NPDN)** (p 469); Title XII – Miscellaneous (p 759), Point (12) Agriculture and food defense (p 766-767)

The APS strongly supports the mission of the NPDN, as it is a critical component of our national infrastructure enabling rapid and strategic responses to plant crop emergencies. ***The APS does not support the proposed change to the administrative structure of the NPDN, namely the shift to the Director of NIFA as the head of the NPDN (Section 12203.c.3.A) in partnership with the Administrator of the Animal and Plant Health Inspection Service (Section 12203.c.3.b.ii).*** We would like the NPDN to continue to function in, and build on, the current structure that has leadership *within* the NPDN. Although a leadership role for APHIS in the National Animal Health Laboratory Network (NAHLN) works for NAHLN, it would have highly negative consequences on the effectiveness of NPDN. Importantly, growers for plant agriculture work closely with extension and local diagnostic laboratories to diagnose and validate potential pest and disease problems *before* involving regulators; this provides growers the latitude to engage expertise in diagnosing problems on any of the many hundreds of plant species that are commercially produced in this country. The involvement of APHIS in administering the NPDN, as occurs within NAHLN, would result in a dramatic decrease in this exploratory reporting by growers due to fear of the potential negative impacts to their businesses of the immediate, and potentially unnecessary, involvement of APHIS regulators. At present, the NPDN has an effective working relationship with the Plant Protection & Quarantine (PPQ) branch of APHIS, alerting and involving APHIS PPQ in a rapid response *when pests and pathogens of consequence are identified*. The number of plant species that are commercially produced in the U.S. is vastly greater than the number of animals; this disparity coupled with the fact that each plant species has its own set of pest and pathogen threats highlights the need for growers to voluntarily engage experts for diagnostic services. The administrative independence of the NPDN is critical to promoting the growers' trust and consequent widespread engagement currently held by the NPDN.

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The APS would also like to state its support for the continued operation of the NPDN through Cooperative Agreements with land-grant institutions, as proposed in the Farm Bill (Section 12203.c.3.b.i). These Cooperative Agreements increase the consistency of funding and leadership within the NPDN.

- Section 7614. **Matching Funds Requirement**

As NIFA implements the matching fund requirements for competitive programs, such as for the Specialty Crop Research Initiative (Section 7305) and citrus programs (Title VII – Research, Point 34, p 697), *the APS requests that NIFA minimize the negative impacts of matching fund requirements on research*, such as by using broader rather than more restrictive definitions for what constitutes matching funds.

Matters related to ARS:

- Section 12203. Agriculture and Food Defense; Section 12203d. **National Plant Disease Recovery System (NPDRS)** (p 470); Title XII – Miscellaneous (p 759), Point (12) Agriculture and food defense (p 766-767)

This comment is in response to the recent transition of the NPDRS to within the ARS. The expertise contributing to the development of NPDRS recovery plans came largely from scientists within the National Plant Diagnostic Network (NPDN) and not based within the ARS. Thus, *the APS would like to encourage that the NPDRS continue their historically collaborative approach and work directly with scientists both inside and outside of the ARS, and particularly with those in the NPDN, to achieve their mission.*

Matters related to the Office of the Chief Scientist (OCS):

- Section 7132. Agriculture Advanced Research and Development Authority Pilot (p 315); Title VII – Research (p 683), Point (18) **Agriculture Advanced Research and Development Authority Pilot (AGARDA)** (p 689)

The APS lauds the proposed establishment of AGARDA as a program that could provide great benefit to agriculture, and appreciates the high priority it provides to projects that “prevent, protect, and prepare against intentional and unintentional threats to agriculture and food” (pp 316-317). *The APS strongly encourages the Office of the Chief Scientist to provide scientists and scientific societies an opportunity to comment on the strategic plan developed for AGARDA (pp 318, 689-690).*

Sincerely,
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Chair, American Phytopathological Society Public Policy Board