

The American Phytopathological Society

In Focus: The Endangered Species Act



About APS

The American Phytopathological Society (APS) is driven by a distinctive community of more than 3,600 scientists, whose energy and commitment ensure the global advancement of phytopathology. Plant pathology is an interdisciplinary science that includes knowledge of botany, microbiology, crop science, soil science, ecology, genetics, biochemistry, molecular biology, and physiology. APS members represent a broad range of specialties, pushing frontiers in the accuracy and speed of field disease diagnosis and increasing our understanding of plant pathology through fundamental research. Members span academia, government, industry, and private practice.

The Endangered Species Act (ESA) & the Fungicide Strategy

The Endangered Species Act (ESA) serves as a critical tool for protecting biodiversity. Its implementation increasingly intersects with agricultural practices, particularly in the use of pesticides essential for plant health and food security. In order to maintain resilient agricultural systems, ensure food security, and support environmental sustainability, it is vital to take a balanced approach to the ESA that considers plant protection needs alongside species conservation and economic development.

One of the key challenges facing APS members is the need for a coordinated federal strategy. The lack of a cohesive, federal-level fungicide strategy that integrates ESA considerations has created inconsistencies in policy implementation and a fragmented approach that is challenging for farmers, regulators, and environmental advocates alike. We hope to work with regulators and Congress to provide consistency for growers, academia, and industry.

APS is dedicated to advancing the science of plant pathology and supporting sound policies that protect both endangered species and crop health. Our society seeks legislative and regulatory solutions that incorporate rigorous science, balancing agricultural and environmental needs to enhance collaborative approaches among key stakeholders.

APS Policy Priorities for a Balanced ESA Fungicide Strategy

Science-Based Risk Assessment Improvements

- **Incorporate Crop-Specific Data:** Require the use of crop-specific data and real-world application rates in ESA risk assessments to ensure that fungicide restrictions accurately reflect environmental risks and agricultural needs. We support continued engagement with the stakeholder community, including academia, user community, and commodity trade associations.
- **Expand Data Collection Efforts:** We request increased funding for research on the environmental and biological impacts of fungicides, particularly regarding at-risk species and their habitats, to create more nuanced risk profiles and inform targeted risk mitigation.
- **Encourage Use of Advanced Modeling Tools:** We request the utilization of predictive modeling to assess fungicide impacts on endangered species within a landscape context, helping to determine high-risk versus low-risk areas and support informed, location-specific decisions.





APS Policy Priorities for a Balanced ESA Fungicide Strategy Continued

Funding and Resources for Sustainable Pest Management

- **Increase Funding for Integrated Pest Management (IPM):** We support a boost in federal funding for IPM research and programs that will enable farmers to adopt environmentally sensitive practices to reduce reliance on fungicides while maintaining effective disease control.
- **Promote Research into Fungicide Alternatives:** We request the support of research grants focused on developing new fungicide chemistries, biological controls, and cultural practices, which offer effective disease management with lower risks to endangered species.
- **Continue to Rely on the FIFRA SAP:** Established by Congress in 1975, the FIFRA Scientific Advisory Panel (SAP) plays an important role bringing scientists from outside the agency into the conversation. We urge EPA to continue to rely on this expertise as they put together the Fungicide Strategy.
- **Promote Interagency Collaboration:** We support the facilitation of enhanced collaboration between the USDA, EPA, and FWS to streamline fungicide approval processes and reduce regulatory burden while ensuring environmental protections.

As decisionmakers turn their focus to the Fungicide Strategy, we ask that you look to APS members as partners in the process. With a deep understanding of the impact through a scientific lens, our members can provide a unique perspective that should be considered throughout the policy process.