



Cal-IPC

California Invasive Plant Council

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September 9, 2009

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

RE: Strengthening APHIS Q-37 screening of plant imports to prevent introduction of invasive species

Secretary Vilsack,

On behalf of the California Invasive Plant Council, I am writing to support stronger screening of plant imports to prevent introduction of invasive plants to the U.S. Here in California we spend significant resources controlling invasive plants—Cal-IPC lists 200 with some level of ecological impact. Many of these were introduced intentionally as ornamentals, and some remain in the trade (we partner with the nursery industry to voluntarily stop using these).

Such plants greatly degrade wildlife habitat, while also damaging ecosystem services like flood and fire protection, water supply, and outdoor recreation. In addition, many diminish crop, rangeland and forest productivity. Some exacerbate public health issues. These invasive plants threaten our country's natural resources and future security.

The top pathway for introduction of invasive plants from abroad remains purposeful importation, mostly for horticultural use. Agencies at the local, state and federal level expend millions of dollars each year (we estimate at least \$82 million in California alone) to control invasive plants, yet more plant species are introduced every day with very little regulatory oversight. Other nations, most notably Australia, have adopted a more conservative approach based on straightforward screening analyses developed to protect the environment without unduly limiting trade. It is long past time for the U.S.D.A. to implement such a screening system. This will require dedicated staff resources, but investing in these resources is essential for protecting the country, and considerably less costly than controlling invasive plants once established.

APHIS recently published draft guidelines for revising the "Q-37" protocol, presenting a unique opportunity to establish a screening system that will protect the country from future introductions of invasive plants. Creating the "not authorized pending pest risk assessment" (NAPPRA) category is an important and useful step, and should be implemented promptly.

In particular:

- A list of plants to be screened for inclusion in the NAPPRA category should be made available, with a timetable for completion of screening evaluations. A procedure for the public to request evaluation of additional plants not previously identified as risky is essential for making the system open and transparent.
- All screening evaluations should be made available to the public. This will allow other organizations to benefit from using them in their own strategic planning, and allow others to contribute additional relevant information for evaluation.
- Plants considered for addition to the NAPPRA category should include not only plants that are not yet present in the U.S., but also risky plants that are already here. This may necessitate an assessment of each plant's economic importance, but continued import of such plants can pose a significant threat to our biosecurity and should be evaluated.

We are confident your leadership can help our state and nation protect itself from invasive plants through implementation of these critical measures. As an organization working to stop invasive plants, we urge you to make strong Q-37 reform a top priority for immediate action.

Sincerely,



Doug Johnson
Executive Director

cc: Cindy Smith, Administrator, USDA APHIS
Rebecca Bech, Deputy Administrator, USDA APHIS PPQ
President Barack Obama
Sen. Dianne Feinstein
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