

May 25, 2020

U.S. Department of Agriculture
Animal Plant Health Inspection Service
Plant Protection and Quarantine
1400 Independence Avenue, S.W.
Washington, D.C. 20250

RE: Stakeholder Announcement of a “Qualitative, Pathway-Initiated Pest Risk Assessment for the Importation of true potato (*Solanum Tuberosum*) seed for planting from the Netherlands into the continental United States.”

On behalf of the National Potato Council (NPC) and the undersigned state organizations, the following comments are offered on the “**Qualitative, Pathway-Initiated Pest Risk Assessment**” for the “**Importation of true potato (*Solanum tuberosum*) seed for planting from the Netherlands into the continental United States**”.

NPC represents the interests of U.S. potato growers on federal legislative, regulatory, environmental and trade issues. The value of U.S. potato production is over \$3.7 billion annually and supports hundreds of thousands of jobs both directly and indirectly.

NPC appreciates the ongoing outreach to stakeholders by the Animal Plant Health Inspection Service (APHIS) on vital pest and disease issues particularly involving international shipments. We believe this outreach early in the process leads to more comprehensive understanding of the pests and diseases threatening our industry, enhanced pest risk assessments and ultimately more defensible decisions on whether to approve or deny market access requests involving potatoes.

On this specific matter, NPC appreciates the opportunity to comment on the pest risk assessment (PRA) and supporting documentation. In the interest of providing comprehensive comments, we have reviewed the documentation released by APHIS and requested analysis by scientific experts who focus their work on the potato industry. Based on our review and bolstered by the assessment of those scientific experts of the PRA, NPC **opposes the importation of true potato seed from the Netherlands due to the high risk of disease transmission.**

Specifically, this opposition is based on the stated ability for *Pospiviroid Potato spindle tuber viroid* (PSTVd) to be transmitted through the true seed. The PRA identifies *Pospiviroid Potato spindle tuber viroid* (Pospoviroidae) Potato spindle tuber viroid (PSTVd) as “a seed-transmitted pest of pepper, tomato, and potato”. USDA has determined that the overall likelihood of introduction of PSTVd to be high, and that the establishment of PSTVd in the continental United States is likely to cause unacceptable economic impact. PSTVd is easily transmitted by contact and can spread in infected tubers, pollen, or true seed (Singh et al., 1992; Slack, 2001).

According to Amy Charkowski, Professor and Head, Department of Agricultural Biology at Colorado State University;

*“potato spindle tuber viroid (PSTVd) used to be one of the **two most common reasons for loss in seed potato production.** It spreads quickly during planting, cultivation, and harvest and the only way to control this pathogen is through strict quarantine and sanitation. Potato growers in the US and Canada have eliminated this pathogen from*

*production and in most potato producing regions of the US, PSTVd has not been seen for several decades. **PSTVd can be spread to new areas efficiently in true potato seed.** For example, researchers in Australia recently surveyed 2000 tomato seed shipments and **found viroid in 5-10% of the lots**, depending on the year. The highest number of infected tomato seed lots came from Europe and Asia. This is a high rate of introduction and this tomato data provides some evidence for the likely level of incidence expected for true potato seed since the two crops are closely related.”*

In regard to issues identified by APHIS in the PRA, of the organisms associated with true potato seed worldwide and present in the export area, USDA has identified one organism that is a quarantine pest for the PRA area, is likely to exceed the threshold for unacceptable consequences in the PRA area, and has a reasonable likelihood of following the commodity pathway (Table 3). Thus, this pest is a candidate for risk management. These results represent a baseline estimate of the risks associated with the import commodity pathway as described in section 1.4.

On page 12 of the PRA, it states there is a HIGH risk that *“PSTVd persists in true potato seed for long periods of time and has been detected in seed stored at room temperature for 21 years and kept in cold storage for 12 years (Singh et al., 1991).”*

Additionally on page 12 of the PRA, it states there is a **HIGH risk that “If infected seeds were planted, PSTVd could spread from the infected host plants to new hosts through mechanical means or by propagation of infected true seed or seed tubers (Owens and Verhoeven, 2009; Slack, 2001). Hosts of PSTVd are distributed across the continental United States in natural and commercial systems (NRCS, 2019).”**

Based on these threats identified by APHIS in the assessment and the concerns raised by scientific experts in our subsequent review, NPC opposes the importation of true potato seed from the Netherlands based on the risk associated with the quarantined pest, PSTVd, being introduced into the United States. The impact to the U.S. potato industry’s domestic production, threat to export markets if PSTVd were established in the U.S. and the potential negative economic impact to family farms and the direct and indirect jobs they support are too great to proceed further on this true seed market access request.

Thank you again for APHIS’ stakeholder outreach and your consideration of these comments.

Sincerely,

National Potato Council

Colorado Potato Administrative Committee

Idaho Potato Commission

Maine Potato Board

Montana Potato Improvement Association/Montana Seed Potato Certification

Nebraska Potato Development Division/Potato Certification Association of Nebraska

Northern Plains Potato Growers Association

Oregon Potato Commission

Potato Growers of Michigan, Inc.

United Potato Growers of America

Washington State Potato Commission

Wisconsin Potato and Vegetable Growers Association