



NATIONAL POTATO COUNCIL

50 F Street, NW, Suite 900
Washington, DC 20001
(202) 682-9456 phone
www.nationalpotatocouncil.org

May 5, 2022

The Honorable Tom Vilsack
Secretary
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Secretary Vilsack:

On behalf of the U.S. potato industry, please consider these comments in response to the U.S. Department of Agriculture (USDA)'s decision to allow the resumption of Prince Edward Island (PEI) fresh table stock potatoes importation. This action occurred following the November 2021 action by the Canadian Food Inspection Agency (CFIA) to suspend export of all potatoes from PEI to the U.S. due to continued detections of the virulent potato wart disease (*Synchytrium endobioticum*).

At that time, the National Potato Council (NPC) was strongly supportive of CFIA's science-based steps to protect their domestic industry as well as the U.S. from further risk from potato wart disease. Those steps were undertaken by CFIA in coordination with the Animal and Plant Health Inspection Service's (APHIS) Plant Protection and Quarantine division.

Disappointment In Politics Intervening Over a Phytosanitary Threat

We respect that both CFIA and USDA came under significant political pressure following those decisions last year, including discussions by Prime Minister Trudeau and President Biden on the subject in the Oval Office. Despite that pressure, the U.S. industry was hopeful that a strong program could be instituted to deal with this expanding disease situation in PEI and safely resume trade.

As you are aware, this disease situation in PEI has been evolving for a number of years. In late 2020, CFIA took the step of suspending PEI seed potato exports to the U.S. after potato wart was found in two seed fields. As we stated last year when CFIA eventually rescinded that suspension after finding no evidence of further disease;

"Though the absence of such evidence appears positive on its face, the lack of clear answers from CFIA does concern our industry. Potato wart is a disease that can lie dormant in the soil for years but if undetected can reemerge and cause tremendous harm."

Unfortunately, CFIA again detected potato wart in 2021 in fields producing potatoes for processing. Those detections came less than a year after the detections in seed fields and just seven months after CFIA viewed the situation as under control and lifted any export restrictions.

As it currently stands, potato wart has been detected on PEI in nine of the past 11 years.

No Significant Change From Previous Requirements

In reviewing the information that APHIS provided following the announcement of a resumption of trade, the U.S. industry sees no significant additional measures to protect U.S. production from this highly destructive disease.

In fact, the one major departure from the previous protocol involves a limitation of PEI shipments exclusively to U.S. Grade Standard #1. This limitation does not appear to have any phytosanitary value. Rather, it is purely a quality standard. High grade potatoes are just as capable of carrying this disease as lower grade.

Had the U.S. industry been asked about this limitation, we would not have supported its inclusion. Establishing this limitation feeds into a false narrative championed by the PEI leadership that the export ban was due to politically motivated factors rather than a serious effort to deal with a disease situation that appears to be growing out of control.

USDA's Policy Encourages Lack of Testing While Canadians Mandate Testing For the U.S.

Measures the U.S. industry did support were not included. One recommendation, testing of fields on PEI prior to their clearance for export, is exactly what the Canadians mandate for imports of Idaho potatoes originating in counties dealing with the potato cyst nematode issue. We are confused and disappointed as to why equal treatment was not required of Canadian potatoes originating in an area hosting a significant phytosanitary threat to the U.S.

In fact, the APHIS standard for these PEI shipments is that they must originate from fields "not known" to be infested with potato wart. Rather than APHIS demanding the certainty of mandated testing and thereby disease-free fields being the foundation of exports, this standard encourages avoidance of testing on PEI. Knowledge of the existence of disease carries a penalty, while ignorance is rewarded by the ability to ship to the U.S.

Soil Testing Declines on PEI

This is particularly troubling as CFIA has documented that soil testing for potato wart on PEI has significantly declined over the past five years. These declines occurred even as the disease detections expanded.

Soil testing is identified in USDA regulations as the most effective tool to detect potato wart. In this case on PEI, it is further warranted as it has been revealed following the export ban that quarantined fields on PEI have still been allowed to remain in potato production. Given that potato wart can lie dormant in the soil for decades and still be a viable phytosanitary threat, this revelation is surprising and clearly indicates that more knowledge of the spread of disease on PEI is demanded, not less.

We were also disappointed that shipments were not limited to consumer packaging sizes. APHIS provided no limitation on large totes or super sacks that are typically taken to secondary facilities

within the U.S. and repacked in smaller lots. During this repacking, waste product is generated that can spread this disease. Consumer packaging prior to shipment would mitigate this threat.

Threat to U.S. Industry

Should potato wart be transmitted to the United States, it would have severe consequences. Beyond the domestic costs to growers and the industry, the U.S. would likely immediately lose access to all international fresh potato markets costing the industry over \$225 million directly in annual exports and billions more in indirect impact. We fear under the current policy it is only a matter of time before potato wart is exported from PEI to the U.S.

Again, we respect the substantial political pressure that Canada applied to the U.S. and the desire to satisfy their interests. Despite those pressures, it is surprising that APHIS would effectively return to the prior protocol given all the troubling information about the disease and the situation on PEI that was revealed following the export ban.

We strongly urge you to reconsider implementing reasonable mitigation measures to deal with this unfortunate disease situation confronting potato production on PEI. We believe this can be done efficiently and without impacting trade in clean product for the upcoming season.

Sincerely,



W. Kam Quarles
Chief Executive Officer
National Potato Council

State Signatories: Colorado Potato Administrative Committee
Empire State Potato Growers
Idaho Grower Shippers Association
Idaho Potato Commission
Maine Potato Board
Potato Growers of Michigan
Northern Plains Potato Growers Association
Oregon Potato Commission
Pennsylvania Co-Operative Potato Growers
Washington State Potato Commission
Wisconsin Potato & Vegetable Growers Association

cc: Undersecretary of Marketing and Regulatory Services
Administrator of APHIS
Deputy Administrator – APHIS Plant Protection and Quarantine