



NATIONAL POTATO COUNCIL

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

November 10, 2022

The Honorable Jenny Moffitt
Undersecretary of Marketing and Regulatory Services
U.S. Department of Agriculture
1400 Independence Avenue, S.W.
Washington, D.C. 20250

Dear Undersecretary Moffitt:

On behalf of the U.S. potato industry, please consider the following comments in response to the October 14th risk assessment from the U.S. Department of Agriculture's Animal Plant Health Inspection Service regarding the ongoing potato wart disease (*Synchytrium endobioticum*) outbreak in Prince Edward Island, Canada. (PEI).

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.

Background on Current Crisis on PEI

We respect that the U.S. came under significant political pressure following the Canadian Food Inspection Agency's (CFIA) decision last year, after discussions with USDA – APHIS, to implement an export ban on PEI potatoes due to their expanding potato wart disease crisis. This political pressure included discussions between Prime Minister Trudeau and President Biden on the subject in the Oval Office.

However, the U.S. industry was extremely disappointed when exports were allowed to reopen with essentially the same protocol as before the ban was implemented. Following that announcement, in May we wrote to Secretary Vilsack and stated the following;

“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.”

Unfortunately, no such steps were taken and additional potato wart disease detections continue to be announced on PEI as recently as last week.

APHIS Risk Assessment – October 14th, 2022

The October 14th APHIS risk assessment clearly reinforces that reopening trade last Spring was entirely premature and there remains an overwhelming risk of potato wart entering the U.S. from PEI. Specifically, we note the following conclusions from the report;

- ✓ *“The full extent of the potato wart infestation in PEI is still unknown but is likely to be larger than currently reported.”*
- ✓ *“Without mitigation measures, potato wart is almost certain to be introduced to U.S. potato production areas via seed potatoes imported from PEI.”*
- ✓ *37% of all PEI seed is imported to U.S. production areas where potato wart can thrive*
- ✓ *“Potatoes for consumption may be a pathway for the introduction of potato wart into the United States”*
- ✓ *“While some soil samples from the 2021 detection have been tested, several thousand remain to be collected.”*

New Protocol is Now Essential

When USDA announced the resumption of PEI potato shipments earlier this year Secretary Vilsack stated, “it is critical that we base our agricultural trade decisions on sound science.” The U.S. potato industry strongly supports this standard.

Based on this October 14th APHIS Risk Assessment, it is clear that the current protocol (the 2015 Federal Order) no longer meets Secretary Vilsack’s standard and does not provide the necessary mitigation to protect the U.S. industry from disease introduction. Therefore, a new protocol must be put in place immediately in order to establish the necessary protection.

In constructing that new protocol, we have the following questions and observations that we trust will be addressed either by APHIS or jointly with CFIA;

- The Executive Summary states that APHIS did not consider any mitigation measures beyond minimal brushing and washing prior to export and visual inspection at ports of entry. Why were additional measures not considered given the substantial risk?
- The pest risk assessment didn’t detail the numbers of soil samples remaining to be tested from PEI. How many tests are still outstanding and when will they be completed? (It should be noted that Canada did not allow U.S. shipments of potatoes to resume in an unrelated phytosanitary issue until all tests were completed. Therefore, **APHIS is allowing a lesser standard for Canadian growers than Canada demands of U.S. growers.**)
- Without having these tests results completed, how will APHIS develop restrictions relating to the shipment of potatoes from PEI to the United States?
- Should potatoes be moving freely today to the U.S. from all parts of PEI when those areas have not completed testing and their disease status cannot be known?

- CFIA has documented their reductions of potato wart testing over the years prior to this most recent crisis. Lack of testing has reduced the ability to track the disease on PEI. CFIA did commit to new testing this year as a condition of resuming exports to the U.S. Once the initial round of tests that are finally complete, will APHIS require CFIA to maintain a meaningful level of testing in PEI for the foreseeable future in order to comprehensively monitor the disease progression?
- Bulk shipments of fresh potatoes are allowed to enter the United States and in many instances are broken down and repacked. The U.S. industry strongly recommended against this practice, as the repacking process creates opportunity for improperly discarded product to spread disease. Will APHIS limit these bulk shipment sizes to reduce this risk?
- If not, will APHIS consider requirements on bulk processing potatoes from PEI to be washed, treated with sprout inhibitor, inspected at the port of entry and shipped to a processing facility that has entered into a compliance agreement with APHIS to ensure appropriate safeguards to minimize the transmission of disease through discarded waste.
- Given the overwhelming risks to the U.S. from seed potatoes, will APHIS maintain the restriction on PEI seed shipments to the United States?
- In determining the geographic areas of the U.S. that are climatically suitable for potato wart establishment, one of the criteria uses average annual precipitation greater than 700 mm (27.56 inches). Considering that most U.S. potato production occurs under irrigation, has USDA considered that this production practice could increase the geographic areas of the U.S. that could be suitable for potato wart establishment?
- In vitro and mini-tubers are less likely to introduce potato wart into the United States but there does remain a risk. Did APHIS consider the soil material used to produce mini-tubers in the greenhouse, including where it was sourced and whether it has been tested prior to being used to grow mini-tubers?
- Has APHIS considered that not all mini-tubers grown on PEI remain in PEI for field production?
- For years, equipment from PEI has moved to other provinces in Canada and into the United States. Has APHIS considered additional requirements on the movement of equipment including; traceback of this equipment, disinfection protocols, limitations on the ports of entry where equipment can enter the United States and mandatory inspections by APHIS at the port of entry?

Conclusion

In contrasting this recent October 14th risk assessment with the information that APHIS provided in April following the removal of the PEI export ban, it is striking to the U.S. industry that no significant additional measures were established to protect our production from this highly destructive disease.

Again, we fully respect the substantial political pressure that Canada applied to the U.S. and the desire to satisfy their diplomatic 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 and comprehensively documented in this October 14th APHIS risk assessment.

We thank APHIS for their work in clearly identifying the ongoing disease risks to the U.S. industry since that political decision was made. Reinforced by this new risk assessment, the U.S. industry maintains its stance and urges you to address our questions in formulating the essential new protocol that this crisis demands.

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
Minnesota Area II Potato Growers
Potato Growers of Michigan
Northland Potato Growers Association
Oregon Potato Commission
Pennsylvania Co-Operative Potato Growers
Washington State Potato Commission
Wisconsin Potato & Vegetable Growers Association

cc: U.S. Secretary of Agriculture Tom Vilsack
Kevin Shea – Administrator – Animal Plant Health Inspection Service
Mark Davidson – Deputy Administrator – APHIS Plant Protection and Quarantine
Senate Agriculture, Nutrition and Forestry Committee
House Agriculture Committee