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

January 18, 2024

Canadian Food Inspection Agency (CFIA)
59 Camelot Drive
Ottawa, Ontario, K1AA 0Y9
CANADA

SUBMITTED ELECTRONICALY TO: cfia.potatosection-sectiondespommesdeterre.acia@inspection.gc.ca

On behalf of the U.S. potato industry, please consider the following comments in response to the three Risk Management Documents (RMDs) the Canadian Food Inspection Agency (CFIA) is currently seeking input on regarding the ongoing potato wart disease (*Synchytrium endobioticum*) outbreak in Prince Edward Island, Canada. (PEI). These RMDs are **Seed potato production in field associated with potato wart, *Synchytrium endobioticum*** (RMD 23-02), **Revisions to the categorization of potato wart (*Synchytrium endobioticum)* primary contact and other contact fields** (RMD 23-03), and **Biosecurity control programs: Options for mitigating the risk of *Synchytrium endobioticum* (potato wart) spread** (RMD 23-04).

Threat to U.S. Industry

Potato Wart is a highly destructive disease that, if established, can render potato production infeasible. The threat is not theoretical as Canada has dealt with exactly this unfortunate situation in Newfoundland and production there is no longer viable.

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.

Our concern is reinforced by the U.S. Department of Agriculture's Animal and Plant Health Inspection Service (APHIS) in their October 2022 report, ***"Assessing pathways of introduction for potato wart (Synchytrium endobioticum) from Canada into the United States."***.

This report evaluated the likelihood of introduction of the potato wart pathogen (*Synchytrium endobioticum*) from Canada into the United States via a) commercially produced propagative material (excluding true potato seed), b) commercially produced potatoes for consumption, and c) soil.

When assessing the ability of *S. endobioticum* to follow each pathway, it considered the life cycle, host range, and climatic requirements for disease development. It did not consider any mitigation

measures beyond minimal brushing and washing prior to export and visual inspection at ports of entry. The report's conclusions are as follows:

- *The full extent of the potato wart infestation in PEI is still unknown but is likely to be larger than currently reported.*
- *Potatoes are commercially produced and grown in home gardens throughout the continental United States.*
- *About half of the potato production areas in the contiguous United States and all potato production areas in Alaska have a suitable climate for potato wart establishment.*
- *An estimated 37 percent of U.S. seed potato imports from PEI go to climatically suitable areas. Without additional mitigation measures, seed potatoes from PEI would introduce potato wart into U.S. potato production areas.*
- *Potatoes for consumption may be a pathway for the introduction of potato wart into the United States if:*
    - *untreated potato waste from processing plants or stores is fed to livestock and fresh manure is then applied to fields or gardens where potatoes may be grown; or*
    - *untreated potato waste is applied as fertilizer directly to fields or gardens where potatoes may be grown; or*
    - *infected potatoes are discarded into homeowner compost piles and the compost is then used to grow potatoes.*
- *Infested soil is a pathway for the introduction of potato wart into the United States; introduction can occur via soil contaminating tubers and via non-sanitized equipment, tools, and vehicles.*
- *In vitro plants or minitubers produced under greenhouse conditions and strict production guidelines are unlikely to be a pathway for potato wart.*
- *Infected potatoes for consumption that are commercially processed, discarded into landfills, composted per U.S. Composting Council guidelines, or used for fuel conversion are not pathways for introduction.*

Differing Levels of Regulation for Fields

CFIA's Risk Management Documents (RMDs) segregate fields based upon their apparent risk level. The surveillance in those fields varies theoretically in accordance with the underlying risk.

Highest Risk - Category A fields are known to be infested with potato wart. These are referred to as "Index" fields and are the highest risk.

Second Highest Risk - Category C fields are the next level of risk as they are adjacent or connected to the infested Category A fields. These fields are only subjected to one soil test coupled with visual surveillance. They begin with mandatory biosecurity protocols and requirements to be free from soil, but those mandates can be waived.[1]

[1] "Category C fields are subject to one soil test during the investigation of the associated Category A field in addition to visual surveillance of four crops following production of PW susceptible cultivars. Biosecurity controls including freedom from soil and processing end use for potatoes produced are required but may be lifted using the field assessment process identified in the PWDLTMP."

Third Highest Risk - Category D fields are the lowest level of risk. Again, requiring only one soil test coupled with visual surveillance. Unlike Category C fields, these lowest risk fields do not have mandatory biosecurity protocols or requirements to be free from soil.[2]

CFIA's Risk Management Documents Acknowledge Disease Movement Into "Lower Risk" Fields

CFIA's Risk Management Documents (RMDs) clearly acknowledge that the current Potato Wart Domestic Long Term Management Plan (PWDLTMP) allows for the movement of Potato Wart between these classes of regulated fields. This disease movement has caused lower risk fields to be upgraded to the highest level of regulation.

> *"Category C fields have been involved in 14 investigations where they have been re-categorised as Category A fields following the detection of Potato Wart in the field. Three of these detections were in subsequent years after the initial investigations.[3]"*

Of these detections, 50% of the Category C fields that were found to be infected were from seed potatoes transmitting the disease. 42.9% of the Category C fields that were found to be infected were determined to have been infected due to improperly disinfected equipment moving the disease. 7.14% were from both.

In regard to Category D fields, these fields have been involved in sixteen (16) investigations where they have been re-categorized as Category A fields following the detection of Potato Wart in the field. Nine of these detections were in subsequent years after the initial investigations." These 16 investigations equate to 43.2% of the Category A fields. These nine equate to 24.3% of the Category A (infected) fields. They all were detected in a later year - additional crop year than the initial detection in associated field.

The CFIA documents indicate that Category C and D fields, have been repeatedly elevated to the highest risk Category A (Index fields) after soil sampling. This repeated activity makes it clear that the current plan is inadequate in controlling the movement of Potato Wart and that the disease is moving.

However, the Category C and D fields receive only one round of soil testing for the disease. This cursory surveillance does not meet the level necessary to reduce the overall number of fields subsequently being found with the disease. CFIA cannot simply rely upon one round of soil testing and instead must make it recurrent in these fields to determine the spread of the disease.

Specific to the proposed recommendations outlined in RMD 23-03 on the categorization of contact fields, there remains a lack of clarity as to criteria that CFIA will use in determining Category D fields that should be reclassified to Category C fields.

Related to seed potato production, we agree with the recommendation in RMD 23-02 that seed potato production in Category A (Index fields) should be prohibited indefinitely.

With the high level of Category C and D fields that have become Index fields after the initial soil

---

[2] "Category D fields are subject to one soil test during the investigation of the associated Category A field and visual surveillance of five crops of PW susceptible cultivars. Biosecurity controls and freedom from soil requirements are not required but good biosecurity practices are always recommended.

[3] These C fields are only soil sampled once, followed by visual surveillance of (resistant varieties?) potatoes to potato wart. Fourteen times they have be re-classified as a Category A - infected field. This represents 37.8 percent of the current Category A fields.

sampling, we are highly concerned about only relying on post-harvest (visual) surveillance on these fields. Instead, these fields must have rigorous soil sampling, coupled with post-harvest (visual) surveillance to minimize the opportunity for disease spread. RMD 23-02 states:

- *The detection of PW in several Category D fields following multiple years of soil testing and surveillance by CFIA indicates that at least some of these fields* ***present a higher risk than previously thought****.*

- *Prohibiting seed potato production in these fields until completion of a full program of soil testing and surveillance procedures which do not detect the presence of PW increases confidence that PW is not present.* ***A more rigorous Category D field assessment protocol is required****.*

- *If an analysis of Category D fields determines that some could be considered "low risk", this will be considered in the process for field assessment and release from specific requirements in the future.*

CFIAs RMD 23-04 on biosecurity control programs states, "*The CFIA's review of past investigations, other risk factors, such as management of waste, historical landowners and field exchange and observations of local spread have concluded that changes to the current program are required and a more rigorous biosecurity approach is warranted.*"

It recommends the implementation of a Farm-based management system to balance "*the risk factors of human-mediated spread through the movement of potato tubers, soil (e.g., tare soil and soil adhering to agricultural farm equipment), agricultural inputs (e.g., manure) and waste streams from a farm using fields restricted due to the risk presented by PW.*" However, CFIA acknowledges that it is likely that the creation of a system of Containment Zones (Contiguous Area) "*may be the most appropriate approach to prevent the spread of PW in situations where detections are high and concentrated in a geographic area and where multiple or unknown risk factors are contributing to spread. In these situations, the persistent presence of PW and unknown duration of the population would warrant more stringent mitigation actions.*"

Gordon Henry with CFIA was quoted in an article published on Saltwire on January 27, 2023 that "*The entire Island was part of the ministerial order because potato wart has been found in each of the counties. And having 36 detections means that we have a substantial amount of detections for a pest that we have zero tolerance for."*

Clearly with detections in **ALL** counties of Prince Edward Island, the risk of spreading Potato Wart to another province or country increases with the movement of any potatoes off the island. Those risks must be urgently mitigated.

Missing Sources of Risk to U.S. Production

Clearly these documents are focused upon domestic (PEI) processes that may impact the spread of Potato Wart. However, we must note that other downstream processes may impact the overall risk of disease transmission. Consideration of those sources of risk is missing in these documents.

Specifically, we remain concerned that the three RMDs do not address issues associated with the movement of **processing waste** (identified by CFIA as wastewater effluent, tare soil and sludge, culls, peels, biogas digestate and potato pulp), particularly from Category C and D fields that could be sold in bulk into other provinces, repackaged and then imported into the U.S.

Further, we see no consideration of the **waste generated by bulk potato shipments** moved into the U.S. and then repacked or further disaggregated. It would be a positive step if CFIA voluntarily

prohibited these bulk shipments from U.S. export, given the waste that is associated with them.

Additionally, we remain concerned that retail (table stock) sales of potatoes may result in **consumers planting these potatoes in home gardens and unintentionally spreading Potato Wart**. CFIA should take steps to limit the size of, and properly label, consumer packs to fully inform the public of the risk of that type of activity.

Immediate Action Is Necessary

The most recent Potato Wart crisis on PEI began in the Fall of 2021. Beyond the initial temporary prohibition on movement of potatoes to the U.S. and the ongoing prohibition on seed movement, CFIA has taken no steps to mitigate the risk of Potato Wart spread to the U.S.

Given the timeframes necessary to address the comments on these documents, followed by notice and comment on updates to the Long-Term Management Plan, followed by implementation of new mitigation, it **will likely be at least three years between the most recent outbreak and action by CFIA to address the risk to the U.S**.

This lack of urgency is an ongoing threat to the U.S. industry. If the roles were reversed, it is a standard that CFIA would never allow of the U.S. in addressing a phytosanitary threat of this destructive nature.

We strongly urge CFIA to take immediate action to mitigate the risks identified by USDA APHIS. Those risks are further heightened as PEI has been allowed to ship product to the U.S. since May of 2022.

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
Washington State Potato Commission
Wisconsin Potato & Vegetable Growers Association

cc: U.S. Secretary of Agriculture Tom Vilsack
Jenny Moffitt, Undersecretary of Marketing and Regulatory Services, USDA
Mark Davidson – Deputy Administrator – APHIS Plant Protection and Quarantine