September 21, 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,

The Tennessee Exotic Pest Plant Council (TNEPPC) was established in 1994 as a body of concerned scientists and land managers to educate and advise on issues involving exotic plant problems and management. Our organization works closely with both private parties and government agencies. The issue of invasive exotic species is of great concern to all facets of society, as the costs, both in dollars and in ecological damage, are of increasing concern.

On behalf of the Tennessee Exotic Pest Plant Council I am writing to support stronger screening of plant imports to prevent introduction of invasive plants to the U.S. Here in Tennessee we spend significant resources controlling invasive plants such as Chinese privet and kudzu.

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, range 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 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’s natural heritage.

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.
Strong leadership from your position is important to achieving this critical step. As an organization working to stop invasive plants, we urge you to make Q-37 reform a top priority for immediate action.

Sincerely,

/s/ Andrea Bishop

Andrea Bishop, Vice President
Tennessee Exotic Pest Plant Council

cc: President Barack Obama
    Cindy Smith, Administrator, USDA APHIS
    Rebecca Bech, Deputy Administrator, USDA APHIS PPQ
    Representative John J. Duncan, Jr.
    Representative Lincoln Davis
    Representative Phil Roe
    Senator Lamar Alexander