

May 23, 2022

Kevin Shea
Administrator
U.S. Animal and Plant Health Inspection Service
4700 River Road
Riverdale, MD 20737

Dear Administrator Shea:

As representatives of the specialty crop growers and sectors that rely on clean plant centers across the nation to ensure that new plantings of perennial crops are pathogen-free, we write to you today to ask that the U.S. Animal and Plant Health Inspection Service (APHIS) increase the funding allocation for the National Clean Plant Network (NCPN) by at least \$1.125 million in the upcoming FY 2023 program cycle to ensure that these centers are able to continue to provide these critical services.

NCPN's role in ensuring that growers have access to plant propagation material that is free of harmful viruses and other regulated pathogens is as important now as it was the day the network was created. In fact, viruses, viroids, and bacteria such as those causing citrus greening-HLB, Little Cherry Disease (LCD), and Grapevine red blotch disease, pose significant threats to entire industries and have made the NCPN diagnostic, therapeutic, and foundation plant services even more essential.

Citrus greening-HLB has devastated the citrus industry. It is estimated that this disease has caused over \$1 billion in damage to the citrus industry in Florida alone over the last five years – costing nearly 5,000 jobs annually. In the other corner of the country, LCD – another disease that is only remedied by full tree removal – has reached epidemic levels in the Pacific Northwest and is continuing to spread at a rapid pace. Entire sweet cherry orchards in have been removed and the size of this high-value crop has been reduced by millions of pounds in recent years.

The services of the NCPN allow growers of these commodities to replant with confidence that they are not re-introducing these devastating diseases into their orchards. Other industries have utilized the NCPN to help prevent the establishment of dangerous pathogens before such devastation is reached. For example, the Hop Stunt Viroid has the capacity to devastate yield by 70 percent in commercial hopyards.

Costs of both supplies and personnel at clean plant centers throughout the nation have steadily increased while NCPN support has remained static in recent years – a situation that has now become even more acute with the rapid inflation that has hit our economy. For example, one clean plant center reported a year-over-year increase of 10 percent in laboratory supplies, compared to a two-to-five percent increase most years. In some cases, supply shortages have forced centers to buy from different vendors, paying a 10 to 20 percent premium. Cumulative inflation since the NCPN funding allocation was increased to \$7.5 million is estimated at over 17 percent.

Professional staff costs have also increased, with a higher-than-expected cost of living adjustment for classified staff. Centers also face increased competition with private industry in hiring and retention, forcing them to offer raises and enhanced benefits in order to retain or attract key staff. In one case, a center absorbed these additional personnel costs by not replacing a staff member who had recently retired, as well as relying on reserve funds. This is not sustainable, and is expected to either affect services or increase costs to stakeholders at a time when input costs are skyrocketing across the board.

The NCPN is a major success story, now considered as “critical infrastructure” serving high-value crop sectors with high-consequence pathogen threats. Improved access to “clean plants” enhances the competitiveness of these sectors, benefiting growers, entire market chains, and ultimately American consumers. We as industry stakeholders intend to advance policy and funding proposals in the context of the next Farm Bill that allow clean plant centers to continue to serve the grower community into the future. However, in view of NCPN’s enormous contributions to the economic viability of key parts of American agriculture, it is imperative that the clean plant centers are able to sustain current services through this economically challenging time in the near term – both for the centers themselves and the growers they serve.

Authorizing language for the Plant Protection Act 7721 Plant Pest and Disease Management and Disaster Prevention Program directs APHIS to allocate no less than \$5 million out of this approximately \$75 million program. Last year, APHIS allocated \$7.5 million to the NCPN. Considering the substantial increased costs faced by clean plant centers nationwide, we respectfully urge that APHIS increase the funding allocated to the NCPN for Fiscal Year 2023 to \$8.625 million, so that these centers can maintain their vital contributions to safeguarding American agriculture.

Sincerely,

AmericanHort
California Association of Wine Grape Growers
California Citrus Mutual
California Fresh Fruit Association
California Table Grape Commission
Florida Citrus Mutual
Hop Growers of America
Hop Research Council
North American Blueberry Council
North American Raspberry Blackberry Association
Northwest Horticultural Council
Oregon Hop Commission
Texas Citrus Mutual
Washington Association of Wine Grape Growers

CC:

Mark Davidson, Deputy Administrator, Plant Protection and Quarantine
Samantha Simon, Associate Deputy Administrator, Emergency and Domestic Programs
Jennifer Nicholson, Coordinator, National Clean Plant Network
Van Pichler, National Policy Advisor, PPA Sec. 7721