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September 28, 2009

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Rebecca A. Bech  
Deputy Administrator for Plant Protection and Quarantine  
USDA-APHIS-PPQ  
Jamie L. Whitten Federal Building  
1400 Independence Avenue, SW  
Washington, DC 20250

Dear Rebecca:

The National Plant Board recognizes and appreciates the recent focus on Black Stem Rust as provided through the technical grain rust meeting held in Riverdale on May 20-21, 2009. The NPB is aware steps have been taken by USDA, APHIS, PPQ regarding this plant disease; however, member states, particularly those in the multi-state regulated area, continue to have ongoing concerns related to label creditability of varieties being distributed, the ability of industry to access Canadian markets, and protection for the U.S. grain industry. As such, the NPB recommends that USDA, APHIS, PPQ continue with detailed discussions with the Canadian Food Inspection Agency (CFIA) that focus on the development of a harmonized agreement that encourages uniform testing of both barberry and mahonia such that nurseries are able to sell nursery stock in Canadian markets.

The NPB also recommends that USDA, APHIS develop survey protocols for common barberry for use in the Cooperative Agricultural Pest Survey Program in order to assess the risk of the impacts of rust including Ug99. Finally, the NPB highly encourages the use of molecular techniques to verify the identity and rust resistance of barberry and mahonia. For the most part, it appears the morphological characteristic verification is no longer an acceptable method of certification, given the large number of cultivars and potential hybridization that has likely occurred.

The NPB realizes that no additional funds have been requested for 2010 to cover the ongoing costs of this program; however, as discussions transition over to action items, I would greatly appreciate any considerations USDA, APHIS, PPQ might provide to meet this critical need. While this program has received minimal federal resources during the last few years, with the increased risk of common barberry re-establishment, coupled with the introductions of new rust disease strains such as Ug99, re-evaluations of safeguarding initiatives to address Black Stem Rust for the near future may be needed.

Ms. Rebecca Bech  
September 28, 2009  
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I sincerely appreciate the opportunity to share the concerns of the National Plant Board regarding this critical issue with you. If I can provide additional information or support, please do not hesitate to let me know.

Sincerely,

A handwritten signature in black ink that reads "Carl P. Schulze". The signature is written in a cursive style with a large, stylized "C" and "S".

Carl P. Schulze  
NPB President

cc:

Vic Harabin, Eastern Regional Director, USDA, APHIS, PPQ  
Phil Garcia, Western Regional Director, USDA, APHIS, PPQ  
NPB Regional Plant Board Presidents