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September 20, 2010

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Deputy Administrator for Plant Protection and Quarantine
USDA, APHIS, PPQ
Jamie L. Whitten Federal Building
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Room 301-E
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Dear Rebecca:

The membership of the National Plant Board urges the USDA, APHIS, PPQ-Permit Unit to cooperate with states and industry to develop a policy that prevents the human-assisted movement of the western corn rootworm, *Diabrotica virgifera virgifera* LeConte variant life stages outside the generally-accepted infested area. In the development of this policy, the Permit Unit must incorporate sound regulatory principles to protect uninfested areas by focusing on permit activities for high-risk research material and eliminate the risk of artificial spread via intentional infestation of research and demonstration field releases.

D. virgifera is a major insect pest of corn, responsible for an estimated \$1.17 billion in lost yield and management costs each year. The *D. virgifera* variant has conquered the cultural control practice of rotating to soybean production every other year, by laying eggs in soybean fields, creating a problem when corn is rotated to the field the following year. This variant is indistinguishable morphologically from other *D. virgifera* and readily interbreeds. The variant is currently reported in northern and central Illinois, northern Indiana, southern Wisconsin, southern Michigan, eastern Ohio, and eastern Iowa.

D. virgifera eggs can be harvested in the lab or from field soil, and used to infest plant breeding field plots for research purposes. In recent years, state and federal regulators have become increasingly concerned the movement of *D. virgifera* eggs around the Corn Belt is spreading the variant at a rate faster than natural spread. Today, researchers have insect culturing facilities within the *D. virgifera* variant infested zone and wish to:

- Ship out or move both variant and non-variant through the same facilities for processing, and
- Deliberately move/release the *D. virgifera* variant for research and demonstration purposes.

In the development of the *D. virgifera* policy, the National Plant Board is requesting strong consideration be given to incorporation of the following elements:

- Granting authorization for interstate movement for laboratory studies; however, waste material from all cultures must be disposed of by autoclaving, deep freezing, or formally approved procedure.

- Granting permits for laboratory, greenhouse, and field studies with *Diabrotica virgifera* for a length of no more than two years. A time-limited issuance will permit re-evaluation of the infested zone in a timely manner.
- All sources of western corn rootworm for greenhouse field studies would be expected to go through the inspection and colony evaluation process. There are concerns some of these sources from outside of the infested zone may have received cultures from out of state. Such a policy could be announced this year with the idea of implementing the requirement for all new permits for the 2011 field season. This would provide time for suppliers to be inspected and start new cultures as necessary.
- Designate the State of Illinois as generally infested. This designation would permit the interstate movement of western corn rootworm from the continental United States into Illinois.
- Mandate inspections of companies within the infested zone who wish to ship stock to areas outside of the infested zone or to states partially infested with the variant for greenhouse and field studies. These companies have two options: First, insects may be collected in the state or county outside of the infested zone, brought back to the rearing facilities under permit, and their progeny may be released in the original state/country of origin. Standard operating procedures must be in place describing how cultures from individual locations will remain separate. Second, beetles may also be brought in from an approved source, such as the USDA, ARS facility in Brookings, SD, and cultured. Their descendants may then be sent to states inside or outside the infested zone under permit. Such cultures must have been established after August, 2008.
- Require companies who wish to deliberately culture the variant to declare their desire to do so on a separate permit application. Once the proper permits are in place, beetles may be collected in a given county, transported to an inspected containment facility for culture, and have their descendants released in the original county of collection. Standard operating procedures must be in place. Releases of the variant will only be made well inside the generally established infested zone, as determined by USDA, APHIS, so as to lessen the possible impact. This option is strongly preferred over allowing the release of these beetles into counties adjacent to the county of collection.

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

Sincerely,



Carl Schulze, President

cc: USDA, APHIS, PPQ-Permit Unit
Regional Plant Board Presidents
Phil Garcia
Vic Harabin
Amy Mann, NASDA