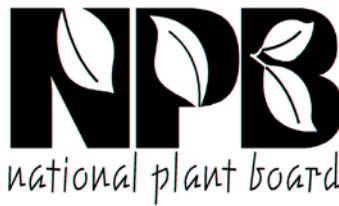


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*August 8, 2013*  
*Louisville, Kentucky*

**RESOLUTION No. 4**

**Biological Control as a Component of Integrated Weed Control**

WHEREAS, biological control is one of the very important tools in the arsenal of integrated weed control practices. In its implementation, a certain amount of risk is anticipated, as with any other vegetation control method. We are concerned that USDA APHIS has become more risk adverse and less transparent in the approval process of candidate weed biocontrol agents.

WHEREAS, a recent example of concern was with the petition for introduction and field release of the yellow starthistle crown/root weevil *Ceratapion basicorne*. Despite the unanimous approval by the Technical Advisory Group for the Biological Control of Weeds (TAG), the petition was denied by USDA APHIS PPQ. We are concerned that USDA APHIS PPQ is becoming more restrictive in its interpretation of the Finding of No Significant Impact (FONSI) and that there is no consistent standard or defined level of risk identified to which candidate biocontrol agents will be held to prior to approval for field release. A zero tolerance for risk is unreasonable and effectively shuts down the pipeline for new biological control agents.

WHEREAS, we are concerned that states, universities and other agencies run a high risk of committing funds for bioagent testing, only to have an agent denied late in the approval process. If this trend continues, the United States will have fewer biocontrol options for keeping noxious weeds in check. With the revision of the TAG Manual, the scientific quality of the biological control petitions has increased dramatically in past years. The risk of doing nothing, while perhaps not a legal concern of APHIS' in the approval process of biocontrol agents, should none the less be considered as part of the decision-making process.

RESOLVED, by the National Plant Board at its annual meeting in Louisville, Kentucky, August 4-8, 2013, that USDA APHIS PPQ take action on the following recommendations: 1) clearly define the review process for biological control agent petitions for introduction and communicate to the states and researchers the criteria by which the agents will be measured; 2) consider the potential benefit of the candidate bioagent (which is an important part of the TAG petition) during the USDA APHIS PPQ decision-making process; 3) provide a more clearly defined explanation for what is meant by an impact on any plant that provides an economic benefit (i.e. when some weeds are grown for medicinal purposes); and 4) USDA APHIS PPQ and TAG should follow the same guidelines and criteria when reviewing a proposed candidate agent.

**Distribution:**

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