Biological Control as a Component of Integrated Weed Control

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-PPQ has become more risk averse and less transparent in the approval process of candidate weed biocontrol agents.

A recent example causing concern was with the petition for introduction and field release of the yellow starthistle crown/root weevil *Ceratapion basicorne*. Despite unanimous approval by the Technical Advisory Group for the Biological Control of Weeds (TAG), the petition was denied by APHIS. We are concerned that APHIS is becoming more parsimonious 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.

States, universities and other agencies run a high risk of committing funds for bioagent testing, only to have the bioagent 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 biocontrol 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 Central Plant Board (CPB) at its 89th annual meeting in Manhattan, Kansas, May 2, 2013, that USDA-APHIS-PPQ take action on the following recommendations: 1) more clearly define the review process for biological control agent petitions for introduction, and communicate the criteria by which the agents will be measured to the states; 2) consider the potential benefit of the candidate bioagent (which is an important part of the TAG petition) during the review process; 3) provide a more clearly defined explanation for an impact on any plant that provides an economic benefit (i.e. when some weeds are grown for medicinal
purposes); and 4) APHIS and TAG should follow the same guidelines and criteria when reviewing a proposed candidate agent.

**BE IT FURTHER RESOLVED,** that USDA-APHIS-PPQ reconsider its denial of the permit for *Ceratapion basicorne* for use as a weed bio-control agent.

Distribution:

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