

Comment to the Senate Committee on Agriculture, Nutrition, and Forestry
On behalf of The American Phytopathological Society (APS; www.apsnet.org)
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July 11, 2002

The American Phytopathological Society (APS), founded in 1909, is the premiere educational, professional and scientific society dedicated to the promotion of plant health and plant disease management for the common good. The Society, representing the interest of five thousand scientists whose pivotal research advances in the understanding of the science of plant pathology and its application to plant health, respectfully submits its comments regarding the proposed transferring of the Animal and Plant Health Inspection Service (APHIS) from the U.S. Department of Agriculture to the proposed new Department of Homeland Security (DHS). As indicated in H.R. 5005, the mission of the DHS is to be three fold: 1) prevent terrorist attacks within the United States; 2) reduce America's vulnerability to terrorism; and 3) minimize the damage and recover from attacks that do occur. While it is true that APHIS employs approximately 3,900 Agricultural Quarantine Inspectors at 186 ports of entry, APHIS plays a larger role in protecting and securing the food, feed and fiber of our nation. The APS is concerned that this larger role may be impacted by a wholesale move of APHIS from the USDA to the DHS resulting from the separation of APHIS from the Agricultural Research Service (ARS) and the Cooperative States Research, Education and Extension Service (CSREES). Thus, in response to your specific queries:

1. What is the reaction of your organization to the proposed plans? Will your needs be met under either of these plans?

While we do not oppose the concept of moving all or part of APHIS to the proposed DHS, we are extremely concerned about the impact this may have on essential APHIS functions. In addition to border and transportation security, APHIS is involved significantly in regulatory issues that impact many aspects of our profession and responsibility in protecting the plant production systems of the United States. These include:

- Insect and pathogen movement permits so that research, instruction and extension programs can be appropriately conducted
- Permits for crops developed through the methods of biotechnology
- Rapid responses, quarantines, eradications, etc. such as those currently underway for Plum Pox Virus and Karnal Bunt;
- Exports and imports of agricultural products;
- Coordination with the Food and Agriculture Organization of the United Nations (FAO) and World Trade Organization (WTO);
- Risk assessment analysis for pests and for traits introduced with biotechnology; and
- Linkages for research with our nation's colleges and universities through CSREES and ARS.

Our concern is that if APHIS is totally moved to the DHS, the only priorities for APHIS will be border and transportation security and that all of the other major functions will not receive adequate funding and leadership commitments because they do not fall under the DHS mission as currently outlined. We are concerned as well about the potential lack of coordination between the DHS and APHIS if the border

functions, alone, were transferred to DHS. Any legislation establishing the DHS must address and ensure adequate resources for these other issues that are essential to food security in the U.S. If all of APHIS is moved, we believe that a new service in the USDA must be established to conduct these essential functions. There must be a commitment as well that adequate resources will be provided to the USDA for the activities that remain at USDA.

2. Do you believe that the proposals meet both homeland security and other critical needs? If not, can you suggest a more logical or preferable alternative?

We do not believe that the proposal, as it stands now, to move all of APHIS to the DHS will meet both homeland security and other critical needs as these other critical needs will be sacrificed for the missions of the DHS. Crop production systems in the United States have provided our citizens a safe and reliable source of food, feed and fiber, and are a recurring mainstay of our economy, currently accounting for 16% of the GDP and 27% of total export value. However, our crops are vulnerable to diseases that may originate from intentional or unintentional release of plant pathogens of foreign or domestic origin. The likely result of such a release is not famine, but rather a loss of public confidence in the country's ability to supply and safeguard our food and fiber. A concomitant loss in the economic viability of our production systems could affect severely the economic well being of affected areas of the country.

We have been fortunate that the present system, while woefully under funded, has mitigated many foreign or domestic threats to our crop production systems through a multi-faceted strategy that has included targeted surveillance involving both trained experts and an informed citizenry, new research-based diagnostics, pathogen identification and database capabilities, and diagnostic laboratories at the local, state, and federal levels. Components of this strategy need significant enhancement, but the current structural and functional links of the regulatory leadership of APHIS, the research conducted in ARS federal laboratories, and the education, extension and research conducted at colleges and universities in part in conjunction with CSREES have been effective. The movement of APHIS *in toto* to the DHS or the transfer of just the border functions may result in reduced communication and coordination among the appropriate expertise to ensure the security of the plant production systems in the United States. Unless that coordination can be continued, and hopefully enhanced, the APS does not foresee an advantage to APHIS being transferred entirely to the DHS.

Under any scenario, we believe that the United States needs a virtual or physical national disease center that will provide many of the same services and national leadership for plants that are currently available for human and animal diseases. A national center is essential to providing leadership in the upgrading, coordinating, and networking of any system for rapid diagnosis of plant pathogens. The center should ensure that the following activities are conducted, managed, and coordinated:

- Ongoing risk assessment and updating of threat agents to crop plants;
- Developing of state of the art databases of plant pathogens that are accessible for rapid diagnosis;
- Ensuring the preservation and management of new or acquired collections of foreign and domestic pathogens;
- Developing diagnostic systems and ensuring that funding is available for the fundamental and applied research necessary for the development of tools and reagents for rapid diagnostics;
- Ensuring access to adequate facilities and well-trained scientists; and
- Developing standardized diagnostic techniques and certification of individuals or labs eligible to make diagnoses.