



NATIONAL POTATO COUNCIL

50 F Street, NW, Suite 900
Washington, DC 20001
(202) 682-9456 phone
www.nationalpotatocouncil.org

July 26, 2024

Canadian Food Inspection Agency

To Whom It May Concern,

The following comments are provided by the National Potato Council and the other state organizations representing the U.S. potato industry in response to the request for public comment by CFIA on the “Draft National Potato Wart Response Plan.”

Threat to U.S. Industry

Potato Wart is a highly destructive disease that, if established, can render potato production infeasible. The threat is not theoretical as Canada has dealt with exactly this unfortunate situation in Newfoundland and production there is no longer viable.

The U.S. does not have potato wart. Therefore, our industry is in a significantly different position than countries that are burdened with the disease and “managing” its progression. Preventing its introduction to the U.S. should be the highest priority for APHIS and the CFIA.

Should potato wart be transmitted to the United States, it would have severe consequences. Beyond the domestic costs to growers and the industry, the U.S. would likely immediately lose access to all international fresh potato markets costing the industry over \$225 million directly in annual exports and billions more in indirect impact. We fear under the current policy it is only a matter of time before potato wart is exported from PEI to the U.S.

Our concern is reinforced by the U.S. Department of Agriculture’s Animal and Plant Health Inspection Service (APHIS) in their October 2022 report, ***“Assessing pathways of introduction for potato wart (*Synchytrium endobioticum*) from Canada into the United States.”***

This report evaluated the likelihood of introduction of the potato wart pathogen (*Synchytrium endobioticum*) from Canada into the United States via a) commercially produced propagative material (excluding true potato seed), b) commercially produced potatoes for consumption, and c) soil.

When assessing the ability of *S. endobioticum* to follow each pathway, it considered the life cycle, host range, and climatic requirements for disease development. It did not consider any mitigation measures beyond minimal brushing and washing prior to export and visual inspection at ports of entry. The report’s conclusions are as follows:

- *The full extent of the potato wart infestation in PEI is still unknown but is likely to be larger than currently reported.*
- *Potatoes are commercially produced and grown in home gardens throughout the continental United States.*

- *About half of the potato production areas in the contiguous United States and all potato production areas in Alaska have a suitable climate for potato wart establishment.*
- *An estimated 37 percent of U.S. seed potato imports from PEI go to climatically suitable areas. Without additional mitigation measures, seed potatoes from PEI would introduce potato wart into U.S. potato production areas.*
- *Potatoes for consumption may be a pathway for the introduction of potato wart into the United States if:*
 - *untreated potato waste from processing plants or stores is fed to livestock and fresh manure is then applied to fields or gardens where potatoes may be grown; or*
 - *untreated potato waste is applied as fertilizer directly to fields or gardens where potatoes may be grown; or*
 - *infected potatoes are discarded into homeowner compost piles and the compost is then used to grow potatoes.*
- *Infested soil is a pathway for the introduction of potato wart into the United States; introduction can occur via soil contaminating tubers and via non-sanitized equipment, tools, and vehicles.*
- *In vitro plants or minitubers produced under greenhouse conditions and strict production guidelines are unlikely to be a pathway for potato wart.*
- *Infected potatoes for consumption that are commercially processed, discarded into landfills, composted per U.S. Composting Council guidelines, or used for fuel conversion are not pathways for introduction.*

The National Potato Council recognizes that the plan CFIA is proposing addresses actions **after** potato wart has been detected in a field.

Importantly, it does not address fields where the disease has not yet been detected. This is notable given that the APHIS pathway analysis of October 2022 states, *“The full extent of the potato wart infestation in PEI is still unknown but is likely to be larger than currently reported.”*

The NPC is very concerned that fields exist with the disease in PEI that have not yet been detected. We therefore believe an extensive survey of all fields with product destined for the United States should be a priority.

Ideally, shipments would only be allowed from fields surveyed and found free of potato wart. This is a standard Canada has required of the US should a similar pest of such significant concern be detected in the U.S. Such a requirement would go a long way toward ensuring that the disease is not exported to the U.S.

With that background in mind, we had the following specific observations and questions about the information provided by CFIA for public comment. CFIA’s statements are *in italics* and the industry’s comments follow;

Classification of Restricted Fields or Land

Following the detection and confirmation of S. endobioticum (i.e. via symptomatic tuber or detection of resting spores), the CFIA will immediately place phytosanitary measures on the field and initiate an investigation to identify the possible source(s) of the pathogen and assess the risk relationships between associated fields based on past and present human-mediated activities.

Comment: What are the “phytosanitary measures” that will be placed on the field? Are they changing from previous actions?

Suspect Field

In a section entitled “Suspect field”, the information about that activity is stated to be *“Under development. A suspect field classification framework for comment will be shared in June.”*

Comment: We have not seen that additional information and are unable to make an informed comment about it.

Farm biosecurity, phytosanitary measures and restricted field use

*“In cases where a field is classified as a suspect field, **phytosanitary controls** will be put in place until a full assessment can be completed, and a final regulatory decision made on the status of the field.”*

Comment: What are those “phytosanitary controls?” Are they effective in preventing disease spread during the period between which the field is identified and the regulatory decision is made?

The preventative control plan must incorporate biosecurity measures that include movement of product, machinery, implements, and conveyances, and waste disposal elements and be tailored to meet the needs of each farm.

The preventative control plan will be a new phytosanitary measure and the steps and timelines for transition will be documented in the transition plan following the finalization of the response plan.

Comment: Who will oversee the implementation of these measures? Given how important it is to minimize the opportunity for disease transmission from restricted fields to adjacent fields, how can the efficacy of this plan be fully reviewed when the preventive control plan won't be made public until after this National Potato Wart Response Plan is finalized.

Production requirements and end use

The production of potatoes, plants and plant parts for propagation other than seed (e.g. grains and cereals) or other non-host root crops is prohibited for a minimum of 20 calendar years from the year of potato wart detection.

Comment: This statement could be read as allowing seed to be grown. It should be clarified that the planting of seed from any crop that may be able to transmit potato wart is prohibited.

Equipment cleaning requirements

A cleaning area separated from the field soil (gravel or similar purpose) is required at the entrance/ exit of an index field to facilitate equipment cleaning. Run-off from the cleaning area must not contaminate other fields.

All machinery, implements, and conveyances must be cleaned free from soil and plant debris and

authorized to move by the CFIA prior to leaving the field. See [PI-016: Procedure for inspecting regulated articles for freedom from soil, plants, plant parts and related matter for details on freedom from soil requirements](#) for more information.

Comment: How will these restrictions be overseen by CFIA? The movement of machinery between fields is an activity that holds a high likelihood of disease spread if host material is not properly removed.

Soil and waste disposal requirements

All plant material that is contaminated with soil can only be moved from the field if a written authorization is obtained from the CFIA. Waste material including soil and potato waste must be returned to the field or disposed of in an approved manner as documented in the farm preventative control plan.

Comment: Again, how will this disposal be overseen by CFIA? This is critical as the activity of moving waste material holds a high likelihood of transmitting disease.

20 calendar years after the initial detection of potato wart in the field

Soil will be collected and undergo:

- *laboratory analysis for resting spores*
- *laboratory bioassay for tuber symptom development*

If potato wart is detected, all phytosanitary measures will remain in place. The field will be assessed again following five additional calendar years.

Comment: What is the level of sampling that will be required during the laboratory analysis? Additionally, we note that potato wart can remain dormant in the soil for decades. Is the 5-year timeframe and appropriate one given the durability of the disease?

27 calendar years (minimum) after the initial detection of potato wart

An index field may be considered for additional assessment on a case-by-case basis. This assessment consists of:

- *laboratory analysis for resting spores*
- *laboratory bioassay for tuber symptom development*

If potato wart is detected, potato production will be prohibited for an additional five years before the field is eligible for re-assessment.

Comment: Again, what is the level of laboratory testing/sampling? Is the 5-year reassessment the appropriate timeframe given the durability of the disease?

Equipment cleaning requirements

A cleaning area separated from the field soil (gravel or similar purpose) is required at the entrance/exit of an adjacent field to facilitate equipment cleaning. Run-off from the cleaning area must not contaminate other fields.

All machinery, implements, and conveyances must be cleaned free from soil and plant debris, and authorized to move by the CFIA prior to exiting the field. See [PI-016: Procedure for inspection regulated articles for freedom from soil, plants, plant parts and related matter](#) for more information.

Comment: Again, the inadvertent movement of soil holds a high likelihood of disease transmission. Is this a measure that can be reasonably regulated by CFIA?

Release of adjacent fields from phytosanitary measures outlined in the response plan

Adjacent field will be assessed for risk of natural spread of potato wart (e.g. via water flow or wind erosion) to confirm that lifting of phytosanitary measures is possible.

If the risk of natural spread is deemed low, adjacent fields may be assessed at the written request of the landowner or land user, using the following procedure:

- *Production of one crop of a potato variety designated as resistant to the pathotype of *S. endobioticum* that was detected / confirmed in the index field (or to all known Canadian pathotypes), followed by soil sampling and **laboratory analysis** for resting spores.*
- *If potato wart is not detected, the phytosanitary measures on the field will be amended to the following:*
 - *Remove the freedom from soil requirement (preventative control plan still required)*
 - *All machinery, implements, and conveyances must meet the equipment cleanliness definition for soil prior to exiting the field as per the procedures described in the grower's preventative control plan.*
 - *Potatoes leaving the farm must be dry-brushed or sent to a facility with a compliance agreement.*
- *Production of two additional crops of a potato variety designated as resistant to the pathotype of *S. endobioticum* that was detected / confirmed in the index field (or to all known Canadian pathotypes).*
 - *Following the third crop of a resistant variety, the phytosanitary measures on the field will be amended to permit production of susceptible potato varieties for processing or tablestock use.*
 - *Potatoes leaving the farm must be dry-brushed or be sent to a facility with a compliance agreement.*
- *Production of one crop of potato varieties designated as susceptible to the pathotype of *S. endobioticum* that was detected / confirmed in the index field (or to all known Canadian pathotypes). This will be followed by:*
 - *soil sampling and **laboratory analysis** for resting spores*
 - **tuber surveillance**

Comment: What are the standards that would determine that a field has met the “low risk” threshold for natural transmission?

Initial production requirements and end-use

Seed potatoes and plants and plant parts for propagation except seed will not be authorized for movement from the other / secondary contact field until the field is released from all phytosanitary measures outlined in the response plan.

Comment: This statement is confusing and contradictory. It appears to both prohibit and allow seed movement.

Suspect Field

A suspect field classification is currently under development and a framework for comment will be shared in June.

Comment: Without this standard for classification of a suspect field, we cannot make an informed comment about its efficacy.

Restricted agricultural fields no longer in host crop, root crop or plants and plant parts for propagation production

Index fields no longer in host crop, root crop or plants and plant parts for propagation production (except seed) may be assessed for partial release from phytosanitary measures outlined in the response plan at the written request of the landowner or land user following a minimum of 50 years of documented non-host crop production.

*Adjacent and primary contact fields removed from use for host crop, root crop or plants and plant parts for propagation (except seed) production can be considered for **partial release from** phytosanitary measures outlined in the response plan at the written request of the landowner or land user. The assessment for **full release** from phytosanitary measures will not be considered until 50 years after the date of classification.*

Comment: We assume that the exclusion of seed means that seed cannot be produced and therefore assessed for partial release from phytosanitary measures. However, that is not entirely clear.

Before a partial or full release, we assume that laboratory testing will be component of the decision-making process in allowing or disallowing such a modification.

Partial release of restricted fields no longer in host crop production

Adjacent and primary contact fields no longer in host crop, root crop or plants and plant parts for propagation (except seed) production may be assessed for partial release from phytosanitary measures at the written request of the landowner or land user.

Fields will be assessed on a case-by-case basis to determine whether release from phytosanitary measures outlined in the response plan is possible (including the risk of natural spread of potato wart into adjacent fields).

Comment: Again, we assume the exclusion of seed reflects its outright prohibition, but it is not entirely clear.

Farm-level preventive control plan requirement

The standard for farm-level preventive control plans will be based on the principles included in

the National Farm-Level Biosecurity Standard for Potato Growers. The standard will be subject to potato sector review before it is finalized and preventative control plans will be tailored to address the needs of each farm unit.

- The preventative control plan must detail **farm-level risk reduction** (i.e. biosecurity) practices implemented to help contain, control and prevent the risk of spread of potato wart from restricted fields that are part of their farm operation and the records maintained to document these practices.
- An implemented plan will facilitate the issuance of a written authorization to permit the movement of regulated things, including machinery, implements, conveyances and potatoes.

Comment: It would be helpful to clarify the history and relationship between the National Farm-Level Biosecurity Standard for Potato Growers and this National Potato Wart Response Plan. The multiple plans seeking to mitigate risk of potato wart can create confusion for stakeholders.

Immediate Action Is Necessary

The most recent Potato Wart crisis on PEI began in the Fall of 2021. Beyond the initial temporary prohibition on movement of potatoes to the U.S. and the ongoing prohibition on seed movement, CFIA has taken no steps to mitigate the risk of Potato Wart spread to the U.S.

Given the timeframes outlined by CFIA previously, it **will likely be at least three years between the most recent outbreak and action by CFIA to address the risk to the U.S.**

This lack of urgency is an ongoing threat to the U.S. industry. If the roles were reversed, it is a standard that CFIA would never allow of the U.S. in addressing a phytosanitary threat of this destructive nature.

We strongly urge APHIS to press CFIA to take immediate action to mitigate the risks identified by USDA APHIS. Those risks are further heightened as PEI has been allowed to ship product to the U.S. since May of 2022.

In the interim, we urge APHIS to take action entirely under its discretion and authority to mitigate the risk of this disease being introduced into the U.S. Specifically, we urge you to implement the following measures for all shipments of potatoes from PEI, in addition to other mitigation strategies as appropriate:

1. **Restrict bulk shipments into the United States to smaller-size packages:** Bulk shipments of potatoes into the United States are often broken down into smaller sizes at intermediate facilities within the United States prior to being shipped across the country. During this repacking process, a substantial amount of waste is generated, which can then transmit the potato wart disease. USDA should limit these large bulk shipments to smaller sizes (20 lbs or less), so that any waste that occurs during the repacking process is significantly retained in Canada.
2. **Limit large retail shipments and properly label any consumer packages:** The U.S. potato industry is concerned that sales of retail (table stock) potatoes may result in consumers unknowingly planting infected potatoes in home gardens, without proper mitigation strategies, and unintentionally spreading potato wart. USDA should limit retail shipments to consumer pack sizes and properly label the packages to ensure the American public is fully informed of the risks associated with potato wart.

3. **Control the waste generated by processing facilities:** Potato processing generates a significant amount of waste product, which, again, can transmit the potato wart disease. Any processing facilities using PEI potatoes should operate under the supervision of USDA and include the treatment of biohazard waste. Such compliance agreements should prohibit the conversion of waste potatoes into livestock feed, because the process could embed potato wart into agricultural land.

Thank you for considering these comments.

Sincerely,



W. Kam Quarles
Chief Executive Officer
National Potato Council

State Signatories: Colorado Potato Administrative Committee
Empire State Potato Growers
Idaho Grower Shippers Association
Idaho Potato Commission
Maine Potato Board
Minnesota Area II Potato Growers
North Carolina Potato Association
Pennsylvania Cooperative Potato Growers
Potato Growers of Michigan
Northland Potato Growers Association
Oregon Potato Commission
Washington State Potato Commission
Wisconsin Potato & Vegetable Growers Association