



30 June, 2022

Administrator Shea
USDA Animal and Plant Health Inspection Service
re: comments on draft framework for APHIS Strategic Plan

Dear Administrator Shea,

The Center for Invasive Species Prevention (CISP) appreciates this opportunity to comment on the draft Strategic Plan Framework for the USDA Animal and Plant Health Inspection Service (APHIS). Our comments will focus on the underlying premises and other generalities since the framework provides few details. Also, we will focus on the agency's responsibility to protect America's plants – in wild as well as cultivated settings.

We agree with the draft plan that over the next 5 years APHIS will confront numerous challenges due to the rise of globalization; advances in shipping and detection technologies; shifting pest risks linked to climate change; and evolving production practices. To protect America's agricultural and wild flora, APHIS must find more effective ways to manage uncertainties.

Unfortunately, recent history demonstrates that APHIS has not yet established policies and practices that are effective in preventing introductions of plant pests – either those known or the many that are unknown. Examples are introductions of beech leaf disease (causal agents not certain, but probably include the nematode *Litylenchus crenatae mccannii*) and boxwood blight (*Calonectria pseudonaviculata* [synonym *Cylindrocladium buxicola*] and *Calonectria henricotiae*). APHIS has also repeatedly failed to prevent spread of regulated pests, as seen in the frequent appearance of *Phytophthora ramorum* in nursery plants shipped to multiple states; and spreading outbreaks of emerald ash borer (*Agrilus planipennis*). **The draft plan does not outline what steps APHIS will take be more successful in meeting these responsibilities than it has been in the past.**

Perhaps the strategic foresight process to which the Plan refers will enhance APHIS' ability to systematically consider a longer time horizon or a broader scope of issues. We would appreciate seeing a more complete description of how this approach differs from decision-making approaches applied in the recent past.

We note specifically the **absence of any reference to steps APHIS will take to measure the efficacy of its programs** – from broad strategies and priority-setting to specific individual pest-mitigation actions (see below).

CISP does consider the proposed new Vision Statement to be better than the current one in that it explicitly refers to protecting the environment.

Core Values

We have some concerns regarding the proposed new Core Values.

First, we support the values to “do the right thing, even when difficult” and “take calculated risks”. However, we are skeptical that APHIS will actually be so brave. We have noted often in the recent past that APHIS has sought to adopt the least disruptive regulation, even when information indicates that it will not be successful in preventing introduction and spread of the pest.

We object to the wording of the “Public Service” value - providing “quality experiences to our **customers**”. Certainly **one** of APHIS’ purposes is to protect agriculture and horticulture; in these situations, the affected parties might actually be “customers”. However, APHIS also has **a duty to protect natural resources, the environment, and the public** (*e.g.*, to minimize costs to them associated with removing trees killed by an introduced pest). In this latter case, appropriate agency actions often impose some inconvenience and cost to agricultural and horticultural businesses. We thus consider **references to “customers” as an impediment** to effective protection of America’s flora.

We also object to the disappearance of the following Core Value that is in the current strategic plan:

Public Policy for Public Good: We base decisions about risk on the best available science, information, knowledge, and analysis. We fully **consider public interests and concerns**, needs of business and commerce. We are **environmental stewards** whose actions strive to protect and sustain the environment. [emphasis added]

Goals and Objectives

We ask that you add a specific Goal to address spread of plant pests and diseases within the country. As noted above, APHIS has not succeeded in preventing spread of regulated pests, and has now chosen to avoid regulating numerous pests, *e.g.*, laurel wilt disease (*Xyleborus glabratus* and *Faffaelea lauricola*), emerald ash borer, spotted lanternfly (*Lycorma deliculata*), beech leaf disease. APHIS must put considerable energy and attention to improving how it works with the states in order to curtail spread of damaging plant pests and diseases.

We note important gaps in the Strategic Goals and Objectives

Goal 2. Deliver science-based solutions that reduce the impacts of zoonotic and emerging diseases and ecosystem changes. This goal needs to mention **plant** diseases; the mention of plant diseases in Objective 2.2 is not sufficient.

Goal 3. Protect agriculture from plant and animal diseases and pests. This goal needs to **include the environment explicitly**. Again, references to plant diseases and pests in Objectives 3.1 and 3.2 is not sufficient. We note the absence of any reference to plant diseases and pests in Objective 3.3.

The Plan must **specify how APHIS will improve its tactics to carry out these duties**, given that it is not now succeeding in preventing pest introductions and challenges are only likely to increase. We suggest opening the agency’s decision-making process and efficacy-measurement processes to evaluation by outside, independent scientists and economists. These should be experts, such as academics, who are not affiliated with parties that have direct interest in APHIS’ regulatory decisions.

Goal 4: This goal is especially problematic.

First, it mentions ensuring safe trade of agricultural products. As the agency is well aware, many pests are introduced on vectors other than agricultural products: ships, railroad cars, containers, and other transportation vehicles and on other types of imports – *e.g.*, steel slabs, decorative stone (separately from the wood packaging), *etc.* The Plan should **outline how APHIS will address these additional vectors**.

A second weakness is the failure to outline **how APHIS will apply its influence in developing international standards and negotiating trade agreements to improve phytosanitary protection for**

the United States. APHIS needs to be open to recognizing when established standards are insufficiently effective – and then lead efforts to improve them. Further, the agency needs to incorporate concerns about the environment and other public interests in more meaningful ways when it is negotiating the terms of trade agreements.

A third weakness under Goal 4 is that the Plan states that the purpose of APHIS' helping developing countries build their regulatory capacities is to facilitate trade and develop future markets for U.S. agricultural exports. The Plan should put **greater emphasis** on APHIS' helping other countries strengthen their regulatory capacities in order to **improve protection of American flora** from introduction of pests from those countries.

We urge APHIS to **restore** from the current strategic plan current Goal 3:

Protect forests, urban landscapes, rangelands and other natural resources, as well as private working lands from harmful pest and diseases.

Finally, we urge APHIS to **restore** from the current strategic plan reference to “different perceptions of risk” as a “driving force” in its work. Such differing perceptions are certainly still true.

CISP agrees that increased globalization and growing complexity of the global supply chain heightens the need to manage risks associated with trade. We concur that APHIS will need new policies, tools, and strategies to mitigate these risks and that it should improve communications with stakeholders and partners. However, the Plan as now outlined does not explain how APHIS will bring about these needed improvements. So it is very disappointing and, in reality, it's not a plan at all.

Thank you for considering our comments. CISP looks forward to continuing to work with APHIS to improve protection of our Nation’s flora – wild and cultivated – and our environment more broadly from non-native pests and diseases.

Yours,



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President
Center for Invasive Species Prevention