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Michigan Invasive Plant Council

Mid-Atlantic Invasive Plant Council

Midwest Invasive Plant Network

Mississippi Exotic Pest Plant Council

North Carolina Exotic Pest Plant Council

Northern Rockies Invasive Plant Council

Ohio Invasive Plant Council

Oklahoma Invasive Plant Council

Pacific Northwest Invasive plant Council

South Carolina Exotic Pest Plant Council

Southeast Exotic Pest Plant Council

Tennessee Exotic Pest Plant Council

Texas Invasive Plant and Pest Council

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September 23, 2009

Secretary Tom Vilsack
U.S. Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Secretary Vilsack,

The National Association of Exotic Pest Plant Councils represents organizations in over thirty states, each supporting natural resource managers who control invasive plants. NAEPPC works to strengthen federal programs and policies addressing invasive plants.

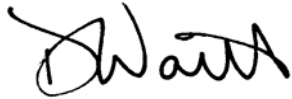
As you know, invasive plants take a heavy toll on agriculture and natural resources. Today the risk of introducing invasive species has never been higher—the country faces an unprecedented amount of international trade and travel, and aggressive species are being considered as potential biofuel crops. It is essential that the US adopt state-of-the-art measures for preventing such introductions. Prevention is much more cost-effective than controlling invasive plants once they are established here.

USDA has proposed the creation of a new category called “not authorized pending pest risk analysis,” or NAPPRA. Plants would be placed into the NAPPRA category if pre-screening identifies them as having significant risk of becoming invasive if introduced (based, for instance, on their having already become invasive elsewhere in the world). A full risk analysis would then need to be completed before these plants could be cleared for import.

This proposed measure represents a significant step forward in strengthening our country’s biosecurity. We commend you and your agency for taking leadership on this critical issue. Purposeful imports have long been a key pathway for introduction of invasive plants, and being cautious about importing those plants with a high potential for becoming invasive is sound policy. The NAPPRA category addresses this pathway appropriately, taking a science-based approach to evaluating plant imports without unduly limiting trade.

We support immediate implementation of the proposed revision of USDA's "Q-37" regulations, and stand ready to work together in preventing the introduction of invasive plants into the US. Thank you for your leadership on this important issue.

Sincerely,



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Rep. Frank Lucas, Ranking Member, House Committee on Agriculture
Rep. Rosa L. DeLauro, Chair, House Appropriations Subcommittee on Agriculture
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Rep. Nick Rahall, Chair, House Committee on Natural Resources
Rep. Doc Hastings, Ranking Member, House Committee on Natural Resources