

# Nursery Practices Coordination Group



Initial Review of APHIS/NPB P-ram Regulatory Working Group Report  
February 16, 2011

# Nursery Practices Coord. Group

- Formed late 2010 to provide “thinking group” and sounding board to inform ANLA, HRI and partners like SAF on potential changes to P-ram program
- 12 volunteer members plus 2 assn. staff
- Geographically diverse (CA, OR, WA, MN, MI, CT, SC, GA, FL)
- Container, field, greenhouse growers
- Large and small operations
- Some in formal “systems” programs, some not

# Process to Date

- Several conference calls in 2010 and 2011 to:
  - Establish common-ground understanding of federal/state program, P-ram status, program review, recommendations for change
  - Build group agreement that this is a national industry issue not state vs. state or region vs. region, and it must be managed accordingly
  - Conduct in-depth review of APHIS/NPB regulatory working group report
  - Develop and share initial technical review
  - Work toward consensus on strategic issues
- Participate in CD-APR discussion

# “50,000 Foot View” of Report

- Immense amount of work and effort by a number of people
- Generally no huge surprises
- We present brief highlights from every section
- Areas of greatest interest, potential opportunity, concern, and industry focus are: “triggers”; “CCP/BMP’s”; and, “protocols”

# 4.1 High Risk Plants

- Generally, focusing resources toward HRP seems sound, science- and risk-based
- Data presented (Table 1) are helpful but lack precision, as significant species and varietal differences are beginning to emerge and should be considered (pg. 8)
- References to “shipping conditions, holds, isolation periods” are ambiguous and, depending on intent, impractical (pg. 10)

## 4.2 Quarantine 37

- Generally, the section left us wondering whether imports are held to a different, less rigorous standard with respect to acceptable level of risk
- Do we have handle on situation in other countries? (pg. 18)
- Technology deployment at PIS, and real-time notification of states, would seem justified
- May make sense to designate ports/PIS qualified to receive and process HAP (pg. 15)
- RFID technology is promising but not yet viable application in this program (pg. 16)

## 4.3 Regulatory Survey

- Widespread perception in industry that West is being held to very high standard as compared to other areas
- Data presented suggest minimal focus on nurseries in many states (pg. 26)
- If concern is that P-ram is in commercial nursery system, more equitable application of resources for survey would seem appropriate

## 4.4 Nursery Assessment Teams

- Supportive of concept
- Important to recognize that getting a nursery cleaned up and back in business is a primary goal
- NATs may be especially useful in working through BMPs that may need to become mandatory as part of compliance agreement for nurseries with repeat positive detections



## 4.5 Triggers

- This is an important section, as clarity and transparency are needed with regard to regulation or deregulation. Nursery group generally supported the approach presented as being risk-based, and allowing for both regulation and deregulation based on science
- We found Table 1 to be misleading, as it does not depict how many nurseries were actually surveyed (pg. 39)

## 4.7 Protocols

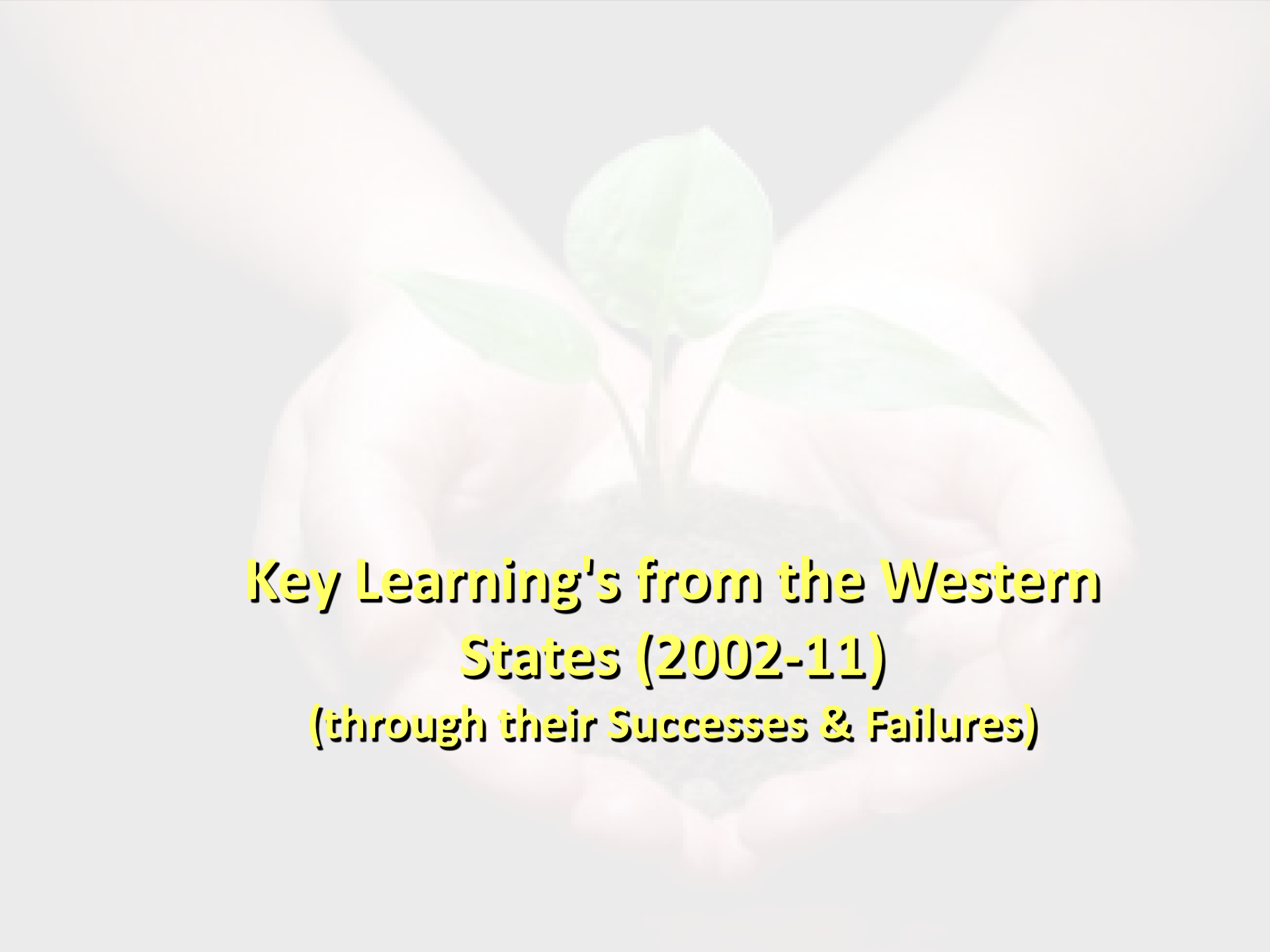
- Our group generally supported the recommendations of this section, and offered a few minor technical edits
- Group is interested in providing more detailed input on any specific proposed revisions to the protocols for confirmed nurseries and retail establishments

## 4.6 Critical Control Points/BMPs

- We found definitions themselves problematic, and recommended alternative wording
- Considerable progress has been made with regard to outreach, education, and piloting of CCP/BMP approaches
- “Mandatory” vs. “Voluntary” is key strategic issue with legal and industry acceptance ramifications

# CCPs/BMPs

- Discussion of CCP/BMP program development and implementation should accommodate both *Phytophthora*-specific approaches, as well as overarching approaches such as a refined USNCP
- The vision for development, outreach, and adoption of CCP/BMP programs should be national in scope

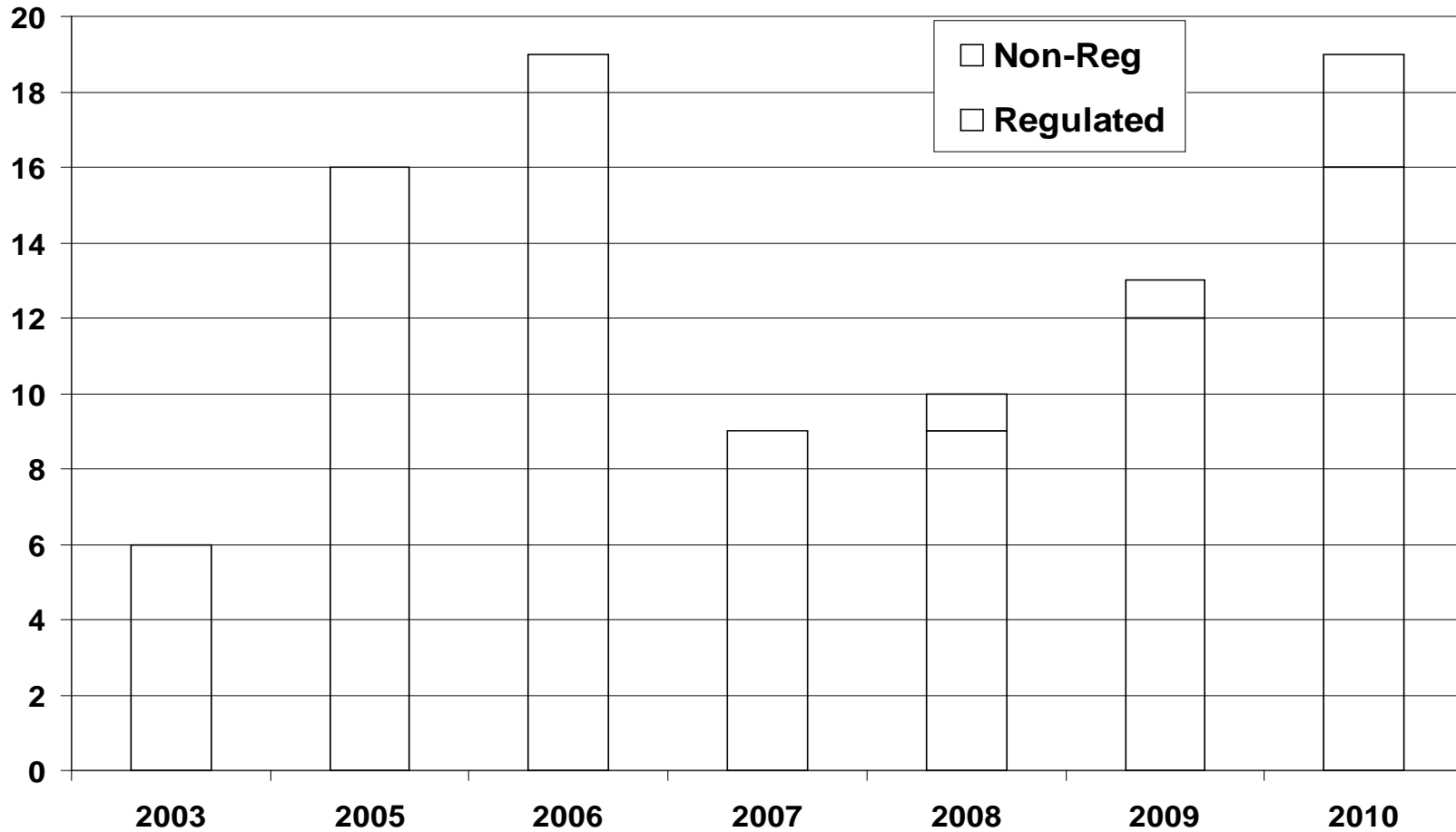
A pair of hands is shown from a top-down perspective, gently cupping a small green seedling with three leaves and a small amount of dark soil. The background is a soft, out-of-focus light gray.

**Key Learning's from the Western  
States (2002-11)  
(through their Successes & Failures)**

# Key Learnings from the Western States (2002-11) (through their Successes & Failures)

- Standardized 'National' Survey
- Farm Bill funded state surveys
- Grower trainings on System's approach (BMPs, or GAIP or USNCP) risk mitigation measures
- Basic research – NORS-DUC...

## *Phytophthora ramorum* Positive Interstate Shippers (Regulated and Non-regulated States 2004-2010)



A pair of hands is shown from a top-down perspective, gently holding a small green seedling with three leaves in a dark pot of soil. The background is a soft, out-of-focus light color.

# **Nursery Survey**

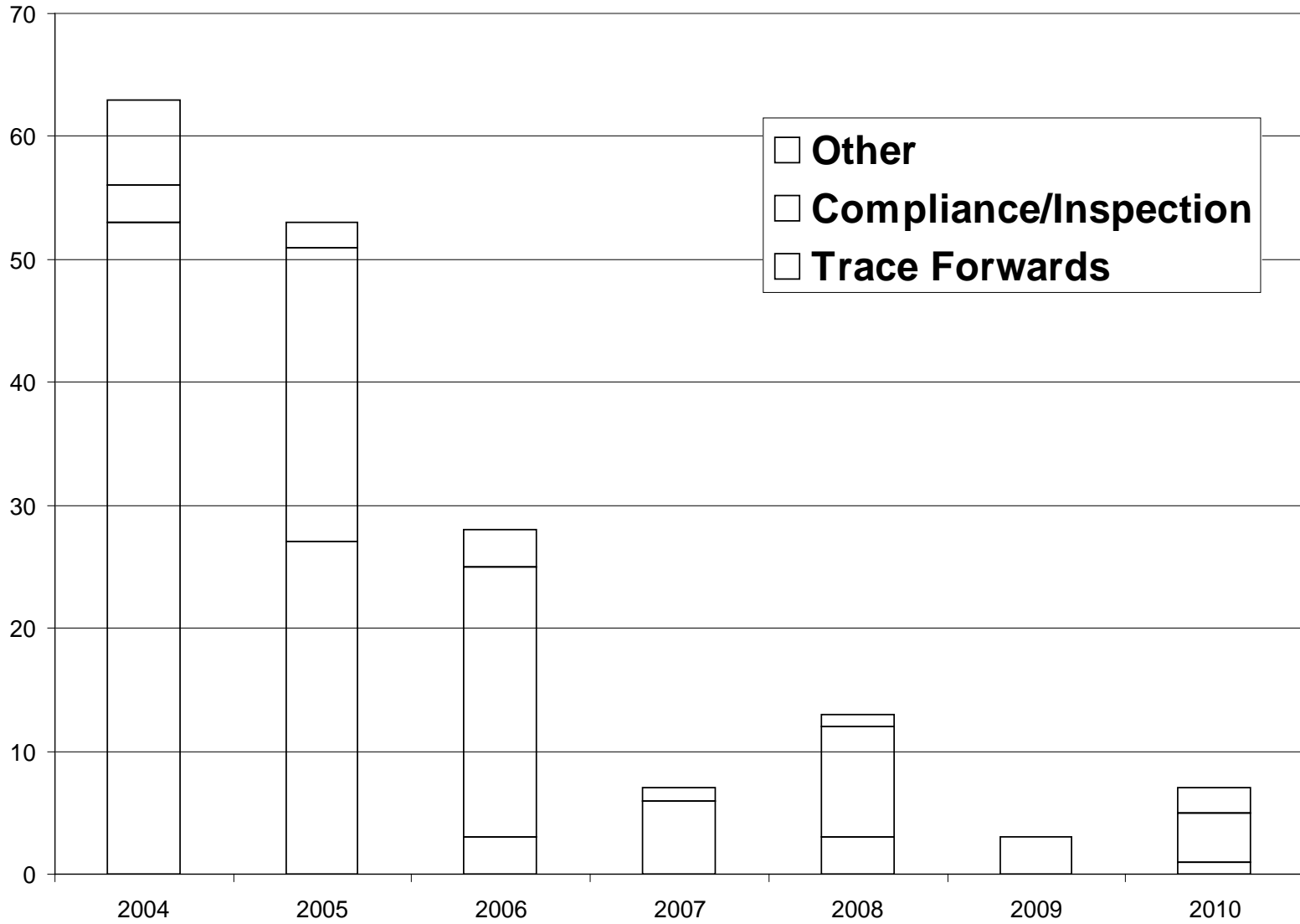
**conducted in 2007 revealed:**

## **For Interstate Shippers**

- **Of the 315 HAP growers in CA,**
  - 208 have BMPs in place
  - 189 volunteered to participate in pilot
  
- **Of the 101 HR growers in CA,**
  - 75 have BMPs in place
  - 61 volunteered to participate in pilot



# Positive CA Nurseries by Inspection Type



GAIP

Standardized  
National  
Survey

BMP  
Pilot  
Program

**Mapping the Future  
(Key Learnings)**

WA/OR/CA  
On-line  
Trainings

USNCP

NORS-DUC

[GAIP](#)

[Standardized  
National  
Survey](#)

[BMP  
Pilot  
Program](#)

## [Mapping the Future](#)

states need a comprehensive approach to disease prevention, detection and management

[WA/OR/CA  
On-line  
Trainings](#)

[USNCP](#)

[NORS-DUC](#)

# Closing Thoughts

- The economic condition of the industry does present practical limits at the operational level, and in terms of volunteer leadership time.
- Farm bill 10201 funding has provided critical resources for leveraging CCP/BMP R&D, efficacy testing, and validation. It remains essential going forward.

# Closing...

- ANLA and HRI regard this issue as serious and important. We believe that the Nursery Practices Coordination Group will help to establish a firm foundation for outreach, consensus-building within the industry, and progress.