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July 25, 2017

ELECTRONIC DELIVERY

Andrea Simao
Assistant Deputy Administrator – Phytosanitary Issues Management
USDA APHIS PPQ
4700 River Road, Unit 140
Riverdale, MD 20737

Dear Ms. Simao:

Thank you for this opportunity to comment on the recent pest risk assessment for the import of potatoes (*Solanum tuberosum L.*) from the United Kingdom into the United States published on March 17, 2017 and announced to the public on May 25, 2017.

The National Potato Council represents the interests of all commercial potato growers in the United States and assists potato growers in addressing market access issues for both fresh and processed potatoes in export markets around the world. The U.S. is a global leader in potato production, and exports of fresh and processed potatoes generated over \$1.5 billion in 2016.

We greatly appreciate our longstanding productive relationship with APHIS on potato market access issues. We would like to provide you with the following comments on the draft PRA.

As you know, it is the highest priority of the NPC to ensure that U.S. potato growers are protected from pests and diseases that would otherwise threaten the industry and the livelihood of our members. As such, we note with considerable concern the list of six pests listed on table 3, page 17 of the pest risk assessment. The introduction of any one of these pests into the United States would **substantially** harm U.S. potato production and could cost the U.S. potato industry tens of millions of dollars in lost export revenue due to the resulting closure of foreign markets.

For the pests outlined in table 3 of the assessment:

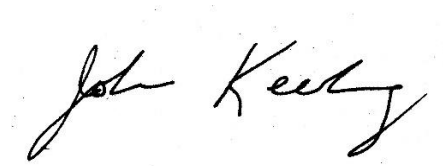
- ***Dickeya solani*** is an extremely aggressive disease that causes severe degeneration to the quality and yield of the potato crop. It is not present in the United States and any introduction would be devastating to domestic potato production. This disease does exist in Europe.
- ***Meloidogyne minor*** is a pest native to the UK. While there are *Meloidogyne* species in the United States, introduction of a new root knot nematode could have serious repercussions. As your staff know well, addressing concerns by trading partners regarding *M. chitwoodi* (Columbia root knot nematode) takes a significant amount of industry resources and APHIS staff time. It is likely the single largest pest issue we continue to address in our exports.
- ***Synchytrium endobioticum*** (Potato Wart) is one of the most serious diseases of the potato and its emergence on Prince Edward Island in Canada in 2000 has severely harmed the economic viability of the Canadian potato industry by reducing yields and making potatoes unmarketable. It is essential that the U.S. potato industry is not exposed to this pest, which has been eradicated in the United States. Discovery of potato wart in the U.S. would immediately shut down ALL fresh potato export markets.
- ***Ralstonia solanaceum* Race 3 Biovar 2** is a pest of major concern for the U.S. in general and the U.S. potato industry specifically. USDA-APHIS has taken significant steps to ensure that it is not introduced. *Ralstonia* detections in imported flowers from Central America during the early 2000's caused major challenges for APHIS and industry, and threatened all U.S. potato exports. It is critical that the U.S. remains free of this pest.
- ***Globodera pallida***, as noted in the PRA, is under official control in Idaho, and millions of dollars have been spent to ensure it does not spread to other areas of the country. Its presence has cost millions of dollars and has harmed local potato production. It is essential that the progress made in controlling this pest is not put at risk.
- ***Globodera rostochiensis*** is one of the most serious pests of potatoes and significant resources are dedicated to ensuring its official control in New York state. Again, it is essential that the progress made in controlling this pest is not put at risk.

The introduction of any one of the above pests would be devastating to the U.S. potato industry. The spread of these diseases in the U.S. could severely affect the quality of U.S. potatoes and would cost the industry its entire export market. NPC therefore urges APHIS to approach any discussion with the United Kingdom with extreme caution.

The National Potato Council is grateful for the work of USDA/APHIS in protecting the long-term health and prosperity of the U.S. potato industry. We are confident that this will continue to be the driving principle as APHIS reviews this pest risk assessment.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in black ink that reads "John Keeling". The signature is written in a cursive, flowing style.

John Keeling
Executive Vice President and CEO