



United States Department of Agriculture

Office of the Secretary
Washington, D.C. 20250

JAN 10 2006

The Honorable Charles H. Bronson
Commissioner of Agriculture
Florida Department of Agriculture
and Consumer Services
The Capitol
Tallahassee, Florida 32399-0800

Dear Commissioner Bronson:

After the 2004 hurricane season, science-based analysis of the disease in Florida citrus indicated that the rate of disease detection and tree removal would need to be increased to successfully eradicate citrus canker. Rapid removal prior to another hurricane was identified as a critical program need. Thus, the Department of Agriculture's (USDA) Animal and Plant Health Inspection Service worked closely with the State of Florida and the Florida citrus industry to implement an accelerated eradication program on 80,000 acres of commercial citrus that had become infected or exposed after the severe 2004 hurricane season. This cooperative accelerated program, which was supported by Commodity Credit Corporation (CCC) funds, involved the removal of trees at a rate of 120,000 trees per week in an effort to eradicate the disease from commercial citrus groves prior to onset of the 2005 hurricane season. Industry resources were also leveraged to hasten detection and destruction of infected trees.

Although substantial progress was made, nearly 32,000 acres of affected commercial citrus remained when Hurricane Wilma crossed a significant area of commercial citrus acreage in October 2005. Preliminary assessment of storm track data from Wilma, coupled with an evaluation of the level of citrus canker inoculum present at the time of the storm, indicate that an estimated 168,000 to 220,000 additional acres of commercial citrus would likely have to be destroyed under the current 1900-foot protocol if the disease is to be eradicated. The estimate includes acreage that is not necessarily infected by the disease, but may have been exposed to it. This information was discussed at an International Citrus Canker Workshop convened in Orlando, Florida, in November, 2005. Subsequent to the Orlando workshop, USDA scientists also consulted with a panel of global experts in citrus diseases about the current situation in Florida. It was their conclusion that the disease is now so widely distributed that eradication is infeasible.

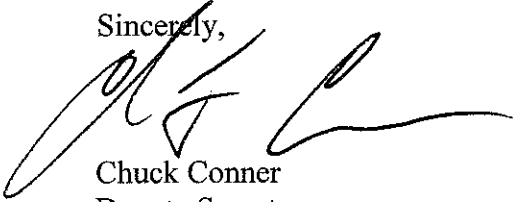
State and Federal officials held further discussions on this issue with Florida citrus industry officials at a meeting in Charlotte, North Carolina, on December 12, 2005, and in subsequent meetings convened throughout December in Florida. Industry representatives have indicated that they would not survive the destruction of more than 25 percent of Florida's commercial citrus acreage. Furthermore, Federal costs to implement the program would require significant inputs beyond the annual \$36 million appropriation for the program and available CCC funds. In addition, Congress would have to provide significant sums for compensation above those sums already provided. Still, it would take anywhere from 5 to 15 years for the industry to recover because the State's citrus nursery infrastructure has been seriously eroded by citrus canker, citrus greening, and storm damage. Without a strong nursery infrastructure, producers would not be able to obtain sufficient resets to support replanting of destroyed trees. In light of our preliminary expert analysis on the distribution of the disease and the infeasibility of eradication, we began discussions with the industry at the Charlotte meeting on the concept of a new citrus disease response plan that would require all commercial citrus and nursery production be performed in compliance with minimum standards to reduce the amount of citrus canker, citrus greening, and other diseases that threaten citrus production in the State. In an effort to best protect remaining uninfested citrus acreage in Florida and other U.S. citrus-producing States, the concept was generally accepted by Federal and State regulators; by Federal, State, and university scientists; and by the Florida industry.

The new approach will be based on maintaining inoculum levels low enough to sustain production as a means to protect the Florida citrus industry. Any further tree removal will be done in the context of maintaining viable citrus production within the parameters of the new response plan, rather than of contributing to eradication. Therefore, we will need to modify the Citrus Canker Cooperative Agreement with the State of Florida to eliminate tree removal for the purpose of eradication and prohibit cooperative funds from being used for that purpose. Instead, we will pursue development and implementation of an area-wide new mandatory response plan to protect commercial citrus production, citrus nursery production, and the citrus budwood collection. The plan will be developed jointly within the next several months by Federal and State officials, in conjunction with industry, and will more than likely have to include elements such as mandatory surveillance and reporting for canker, greening, and other exotic pests; strict sanitation controls over movement of equipment and personnel; management/control of disease vectors such as Asian psyllid and aphids; and registration of growers who move product interstate and internationally. In addition, we will have to establish conditions for the movement of fresh fruit in interstate and international commerce from canker-infested production areas. This will necessitate the development of a risk assessment. A soundly restructured agreement around a strong response plan will allow us to continue to certify shipments of Florida citrus for movement to other countries and to uninfested areas of the United States.

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We would like to continue our discussions with State officials to develop a strong management plan and revise the existing cooperative agreement. In light of current conditions in Florida, the best available information we have suggests that the 1900-foot rule should be eliminated to support the revised cooperative agreement and the new approach to citrus health. We look forward to working with you to assist this important industry in its transition to this new approach to citrus canker.

Sincerely,

A handwritten signature in black ink, appearing to read 'Chuck Conner', with a long horizontal flourish extending to the right.

Chuck Conner
Deputy Secretary