



Advocating for progressive integrated pest management to improve environmental, social and economic conditions through the application of scientific principles.

September 7, 2012

Dr. H. Michael Harrington
Executive Director, Western Association of Agricultural Experiment Station Directors (WAAESD)
CAMPUS DELIVERY 4040
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Re: Comments on the New IPM Program Working Group Discussion Paper

Dear Mike:

We appreciate the opportunity to comment on the IPM Program Working Group Discussion Paper draft, and appreciate the Working Group's effort in preparing this document.

We agree that the Integrated Crop Protection Program (CPP) consolidation provides potential benefits including management efficiencies, greater visibility and critical mass. We remain supportive of IR-4 and its stakeholders' concerns about consolidation. We strongly support the roles of the IPM Center and the inclusion of Community IPM in the Essential Elements.

We suggest that the following comments/ideas under consideration be adopted in the discussion paper:

Creation of a national IPM coordinator in the office of the Undersecretary of Agriculture. A national coordinator is essential to represent IPM at the federal level. The position would increase the visibility of IPM and improve coordination, efficiency and outcomes.

We suggest the following additions to the discussion paper:

Consolidation must be contingent upon the allocation of additional dollars to compensate for the loss in operating funds represented by new indirect allowances in the budget proposal. The CPP would allow indirect costs to be charged to program activities by host institutions. Functionally, this represents an approximate \$4 million decrease in operating funds for IPM programs.

The Methyl Bromide Transitions Program must not be included in the consolidation unless the funding provided for this program is maintained. Including and continuing the program without

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ongoing funding would create an unacceptable drain on IPM funding currently used to meet other critical needs.

It would be helpful to include a table of the programs proposed for consolidation, with a side-by-side comparison of current and proposed funding levels for the consolidated program.

Finally, we suggest clarifying the statement under consideration regarding the IPM Coordinating/Administrative Council. How would this Council relate to, differ from, or replace the existing Federal IPM Coordinating Committee? The Federal IPM Coordinating Committee provides a valuable networking and coordination role. Perhaps participants in the existing committee would be in the best position to contribute suggestions on how to improve the paper's statement regarding the Council.

We look forward to working with you, NIFA and others to ensure that the new program is defined and structured appropriately, properly funded and effective in meeting the needs of stakeholders.

Sincerely,



Thomas A. Green, Ph.D.
President, IPM Voice

cc: IPM Voice Board of Directors:

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