# **GROWERTALKS**

### **Features**

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## Approaching Plant Health Systematically

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"Phytosanitary" is a word that doesn't roll off the tongue easily, but it's vitally important to our industry.

It's a fancy word for plant health through certification that a grower earns by meeting certain requirements. And there are a lot of everyday products we use that are also required to meet certain conditions.

Food is a given—it's common knowledge that the USDA is in charge of inspecting our meat and poultry, while the FDA is looking at finished produce and packaged goods. And baby items like cribs and high chairs, children's toys, and even the clothes you're wearing must meet certain standards or go through some type of inspection—especially if they're produced outside the boundaries of the United States.

So it's not surprising that since about 90% of our vegetative spring annuals are propagated at offshore farms, our industry has come under more scrutiny during the last 20 years. As with any living thing, plants can be hosts to pests and diseases. No one wants insects, bacteria and viruses to accidentally hitchhike over here on a cutting and wreak havoc on our food crops (or worse, our livestock or citizens), so government agencies like the USDA's Animal & Plant Health Inspection Service (APHIS) are in charge of policing every plant that comes into the country.

As a proactive measure, AmericanHort and a handful of suppliers have been working together to develop and implement a couple of phytosanitary programs that include stringent protocols that significantly lower pest risks, while alleviating some of the bureaucratic burdens for growers.

#### Why do we need phytosanitary protocols?

Since growing ornamental plants to sell to consumers became a legit business about 100 years ago, there have been licenses or registration required to ship them from state-to-state. And the requirements and fees vary depending on the state and the type of crop. When it comes to imports or exports, pretty much everything needs an inspection.

For many growers, the process has been arduous and tedious—there can be frustrating delays, which mean additional costs (if the inspector is busy that day, the product that's ready to ship or arriving in the U.S. has to sit). It's been a red tape nightmare.

So, about five years ago, four young plant suppliers (Ball Horticultural Company, Dümmen Orange, Syngenta and Proven Winners) began to work in partnership with APHIS and facilitated by AmericanHort to develop a new certification program for offshore cuttings. The vision was to address phytosanitary risks at the offshore production facility, instead of a clunky process where rooting stations have to get every single incoming shipment inspected, cleared and paid for.

Still in the pilot phase, the program they're currently calling the Offshore Cuttings Greenhouse Certification Program establishes minimum acceptable conditions for facility design, maintenance, water management, hygiene and other parameters. A baseline is established and each participant must meet or exceed those goals, and is subject to audits by APHIS and the national plant protection organization in the country of production.

With a successful pilot completed, the program should soon go fully operational. When it does, as long as the grower remains compliant, they can ship cuttings when they're ready and most of them will be able to bypass the usual APHIS inspection, getting to the rooting station that much faster.

Another new initiative is the domestic Systems Approach to Nursery Certification, or SANC, a partnership involving the National Plant Board (state regulators), APHIS and AmericanHort.

"SANC is premised on the notion that looking at the plants at the end of the production process, trying to find signs of insect or disease infestation, is really not the smartest way of doing business," explained AmericanHort's Craig Regelbrugge. "The smarter way is, in essence, sort of an adaptation of a total quality management approach to the production process."

Craig said that it's very similar to the model that the food industry uses, where it's easier to pinpoint and avoid potential issues upfront rather than when the product is ready to go out the door.

"For the USDA inspector, it's less about the hamburger coming off the line and it's more about all of the points at which a hazard can be introduced into the system and what measures are being taken to address those," he said.

The SANC program is a first of its kind (there's currently only a formal phytosanitary program for shipping certain greenhouse plants between the U.S. and Canada) and what it essentially does is take all of the different conditions from the local level to a broader umbrella program that meets every state requirement for a grower's market. It allows domestic producers to ship plants around the country, modernizing the process, making it easier for U.S. growers to serve their customers with a strong focus on healthy plants.

"With both programs, it all comes down to a systems way of managing your business to prevent the spread of insects and disease, and then hopefully, it's easier for the government to be more comfortable with a harmful pest not coming in or moving around on our commodity crops," said Dr. Mike Klopmeyer, who is Ball's representative on phytosanitary certification and has been working extensively on both programs.

#### Why should you care?

With all of the activity around the development and implementation of phytosanitary programs, we are, in some respects, moving a little closer to self-regulating. After all, SANC and the Offshore Cuttings Greenhouse Certification Program were created with our industry's input and not just by the government.

The old fears from Ralstonia coming in on geraniums in the 1990s are still fresh—at least as far as APHIS is concerned—and that certainly was a catalyst for why the group decided to be proactive in implementing these phytosanitary programs, said Craig. But that wasn't the only reason.

"We have a tendency to be lumped in with Emerald Ash Border and Spotted Lanternfly, and that didn't come in on our material," said Mike. "So we're trying to separate ourselves from that and give assurances to the USDA that we can professionally grow our plants under a systems approach, and material that comes in will require a minimal amount of inspection to look for these novel pests that are coming in."

And recent outbreaks of *E. coli* and Listeria on field-produced greens have put all growers under the radar, regardless of what crops they grow.

"All of the food safety analogies apply here," said Craig. "We're lucky, in a way, that the consequences are not quite

so acute as making people seriously ill as a result of something we've done. But there is a growing scrutiny on our industry for the impacts pests we might inadvertently spread are having on farms and forests."

It goes back to the old saying, "If you want it done right, do it yourself." If we didn't take the steps toward meeting the regulators halfway, then someone (see: the government) was eventually going to do it for us—and we probably wouldn't have liked the end result.

"We as an industry are seen as a pathway for these harmful pests moving around and that's why we're regulated in the first place," said Craig. "So this is really all about how we as an industry maintain our ability to access markets, ship as unencumbered as possible, have a level commerce playing field to succeed financially in the face of increasing scrutiny.

"It's really about prioritizing plant health and figuring out better ways to do business. When something goes wrong, it costs money. It can result in lost crops, lost sales, quarantines, an upset customer. This is risk management."

#### Anyone can do it

Even if you're a grower that doesn't ship interstate, the SANC program may appeal to you because it can offer many added benefits for your operation. Craig says the businesses that have gone through the process have reported very positive feedback, including being more disciplined when it comes to sanitation and plant health. It also changes the mindset of your staff—plant health isn't just one person's responsibility, but everyone's.

"Everybody understands why plant health is important and what can affect it, so it's a true cultural change," said Craig. "Many believe that it's allowed them to be better growers."

Dickman Farms located in Upstate New York is one of the first operations to adopt the SANC program. As a rooting station and a wholesale young plant producer, Bob Dickman—who's been in charge of implementing the program—agreed that it's empowered everyone in the greenhouse to take ownership of the process.

"We put a lot of sweat equity into the program," said Bob. "We were already doing a lot of the processes, but never documented it. SANC forced us to look at our pest management plan, production practices and facility to ensure we are doing the right things."

Bob said SANC has not only helped them improve their growing methods, but has allowed them to maintain a good relationship with their local inspectors, which they feel is vital.

"We decided to participate because it's a better, more expedited way to ship plants domestically," he said. "And it was a joint effort between businesses, state ag officials and our markets."

### **Moving forward**

As the Offshore Cuttings Greenhouse Certification Program gets more established, more operations participate and it proves to be successful, AmericanHort and industry suppliers can have other conversations with APHIS about how the program can evolve, perhaps even including how biologicals can play a role. Right now, to APHIS, all bugs are bad bugs, even if they're beneficials or not. But maybe there will be a time when offshore production farms can practice the use of biological controls on a regular basis and can still pass through customs because APHIS will know the difference. But we have to prove first that we have good faith in protecting U.S. agriculture, said Craig.

There are three positive evolutions that Craig is hoping we'll see as the Offshore Cuttings Greenhouse Certification Program and SANC moves forward:

1) A better, easier way for growers to avoid major pest issues. Buyers are already putting all of the risks on their vendors, especially when it comes to plant health, so the hope is that this makes it easier for growers—

especially those who grow for the big boxes.

"It does not body any good when a quarter of Home Depot's garden center is cordoned off with yellow 'Do Not Enter' tape on a Mother's Day Weekend. And we've seen that in recent years, like with Sudden Oak Death."

- 2) The ability to include more sustainable best practices. There are several different sustainability certification programs that many growers have participated in, like MPS, and the phytosanitary group has had conversations with those organizations to express that both certifications are actually interrelated. "It may be a logical evolution of their programs to begin to recognize a grower's participation in these phytosanitary programs as a contributing point," said Craig.
- **3) Better crop insurance.** There was language in the new Farm Bill that was signed into law in December 2018 directing the USDA's risk management agency to research the feasibility of new crop insurance tools in the greenhouse industry, including the ability to insure against loss from a regulated pest. Hopefully, we'll start to see movement on that.

Developing these phytosanitary certification programs have been a lot of work with some frustrating setbacks, but the ultimate goal has been to make it easier for growers and suppliers to ship their products to their customers. It's a simple notion that's been a major pain-point for many young plant producers. But the success of our industry has always been top of mind during the process, said Craig.

"I think as we go forward to the extent that there are more formalized safety-net programs, growers who are participating are probably going to have an advantage." **GT**