

MEDIA ADVISORY
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National Research Council Report: USDA's Science on Light Brown Apple Moth Lacking

Risks Posed by Moth Overstated

A report by the National Research Council (NRC) released today found that the U.S. Department of Agriculture (USDA) has overstated the risks posed by the light brown apple moth (LBAM) and that USDA "did not conduct a thorough and balanced analysis" and did not communicate its justification for classifying the moth as a quarantinable pest "in a scientifically rigorous way or with sufficient clarity."

"Overall," the report by the NRC, part of the National Academy of Sciences, says, USDA's analysis "would greatly benefit from the use of more robust science to support its position."

The NRC report addressed an unpublished USDA response to two petitions filed last year requesting that LBAM be reclassified as a non-quarantinable insect because of the lack of evidence of LBAM damage in California and elsewhere in the world where the moth is naturalized.

"The biological data presented in the [USDA] Response to support the invasive nature of LBAM, its history in California, and its potential geographic distribution in the United States are problematic and in some cases not based on sound, rigorous science. In particular, the prediction of the potential geographic distribution of LBAM in the United States ... and all economic analyses based on it, are questionable and in need of reassessment with a more rigorous approach" the NRC report concludes.

Ending LBAM's status as an "actionable, quarantinable pest" would end eradication treatments by the USDA and California Department of Food and Agriculture (CDFA), including aerial pesticide spraying, that have been met with widespread public resistance. Reclassification of LBAM would also end quarantines that have restricted farmers' ability to ship produce and subjected crops to frequent inspections and required chemical treatments.

The NRC report noted that USDA did not justify its decision to pursue eradication of LBAM and that "it is debatable whether [USDA] has met" the criteria that are prerequisites for successful eradication: acting before a species becomes widespread (LBAM has been found in 18 California counties so far), and maintaining public support for the program. The report recommends that USDA conduct a study that includes "scientific feasibility and cost-benefit analysis, of LBAM eradication and alternative control approaches."

"The single most resounding message of this report is the inadequacy of the science underlying USDA and CDFA's LBAM policy," observed James Carey, Professor of Entomology at the University of California, Davis, an expert in invasive species.

The NRC report found that “There is substantial uncertainty about the ability of LBAM to spread geographically, about its host range, and about the severity of damage that it can inflict on host plants” and expressed “substantial concerns regarding the economic component” of USDA’s analysis, “based primarily on the ambiguous foundation of the analysis for the predicted geographic distribution of LBAM and the inconsistent and sometimes incomprehensible analytic techniques used” by USDA.

“The NRC’s report vindicates what we have been saying for two years – that USDA’s decisions about LBAM have been based on selective and outdated science,” said Nan Wishner of Stop the Spray East Bay.

The NRC committee also labels USDA’s conclusion that LBAM populations are increasing: as “misleading,” noting that it is not possible to accurately track populations given “the increasing number of traps and the increasing geographic area of their placement.” The report also states that LBAM trapping efforts prior to the launching of the eradication program in 2007 were “probably insufficient” to determine whether LBAM was already present in the state.

Regarding USDA’s acknowledgment that “the greatest economic threat posed by LBAM is losses associated with trade restrictions on host plants and commodities in both international and interstate trade,” NRC comments, “Trade restrictions have been known to be imposed in ways that ignore basic biology.”

The committee noted USDA’s misrepresentation of scientific literature, for example concluding that LBAM poses a risk to forests when the literature indicates the opposite and that in many cases USDA claims lack sources or cite questionable references, such as a single unpublished email from an industry representative as the sole basis for estimates of LBAM costs to the nursery industry.

Regarding USDA’s citing of the Plant Protection Act (PPA) as a basis for classifying LBAM as a quarantinable pest, NRC observes that “while the PPA confers broad discretion, it does not obviate the need for rigorous science in arriving at and communicating the basis of decisions regarding pest status classification and actions taken to mitigate the problem.”

The 10-member NRC committee that prepared the report included Dr. Jerry Powell, emeritus professor of entomology at UC Berkeley, who identified LBAM in his Berkeley backyard three years ago, and Dr. Nicholas Mills, UC Berkeley, who is researching biological control of LBAM. Two committee members are current or former USDA employees.

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