

A. Richard Bonanno, Ph.D.,  
Massachusetts Vegetable & Flower Grower on behalf of Friends of IR-4<sup>1</sup>

Dear Subcommittee Members,

**Subject: Written Testimony to the House Subcommittee on Agricultural Appropriations regarding the President's FY 2013 Budget Request against the elimination of Dedicated Funding for Minor Crop Pest Management (IR-4 Project) within USDA-NIFA Research and Education Activities**

US agriculture is made up of hundreds of crops of which only a dozen or so are considered major crops. The rest are referred to as minor or specialty crops and form the backbone and bloodline of our country's food supply. The commodity groups supporting this letter represent those who grow all the high quality vegetables and fruits we eat, the herbs and spices that add flavor to our lives, and the flowers and landscape plants that make America a beautiful place to live. All crops require pest control whether grown organically or conventionally. Due to cost of meeting EPA standards, which ensure all pest control compounds are safe to both human health and the environment, it is often economically unfeasible to commercialize pest control products for minor markets without public support. The limited acres on which these crops are grown do not provide the economic incentive for the private sector to register these products on our crops. Recognizing the need for the government to assist with pest management in specialty crops, the IR-4 Project was created nearly 50 years ago to help America's specialty crop growers. The IR-4 Project is widely considered to be a model program with a history of successfully providing specialty crop growers with needed production tools and has deep support throughout the agricultural community.

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<sup>1</sup> The Friends of IR-4 is a large diversified assemblage of commodity/agricultural organizations that rely upon and support the IR-4 Project as it currently exists. For more information, go to [www.saveir-4.org](http://www.saveir-4.org)

We believe the IR-4 Project has become one of the most efficient, indispensable and reliable government programs ever developed. Simply put, specialty crops cannot economically survive without the IR-4 Project. Since the IR-4 Project is so crucial to our existence, we felt great alarm and deep concern when the FY 2013 President's Budget Proposal for the USDA National Institute Food and Agriculture (NIFA) was proposing to transfer the IR-4 budget line item (Minor Crop Pest Management in Research and Education Activities) into a proposed new Crop Protection Program which includes five integrated pest management (IPM) programs. This proposed elimination of dedicated funding for the IR-4 Project will have profound negative impacts on production costs for all specialty crops and will result in unsustainable economic losses to growers, food processors and, ultimately, the consumers.

We support the logic and financial considerations behind the proposal to consolidate five similar Integrated Pest Management Programs into the proposed Crop Protection Program. However, we believe that the Crop Protection Program is not the appropriate place to merge IR-4 due to its distinct objectives, which do not dovetail into the other IPM programs.

We offer the following reasons why we are adamantly opposed to this move:

- 1) The five Focus Areas for the proposed Crop Protection program, as documented in the Explanatory Notes, which was submitted to Congress in the President's Budget, do not include the primary IR-4 mission of "supporting the development of appropriate data to facilitate registration of sustainable pest management technologies for specialty crops and minor uses". Thus, it appears that USDA does not intend to continue to support the regulatory approvals of new crop protection chemicals and biopesticides for food and non-food specialty crops in the proposed Crop Protection Program. **We consider this change to be a serious threat to specialty crop agriculture in the United States.**

- 2) IR-4 is exempt from indirect cost recovery by the host land-grant universities under 7 USC 450i(e), the NIFA grant currently provided to fund IR-4. The proposed Crop Protection Program transfers funds to Integrated Activities which would allow up to 30% indirect cost recovery. If IR-4 is included as part of the Crop Protection program, it means a 30% decrease in funds available for IR-4 project. This funding decrease is a very threatening proposition for specialty agriculture and is something that we cannot accept.
- 3) IR-4 does much more than crop protection chemical testing. IR-4 collaborates with:
- **USDA-Foreign Agricultural Service:** To reduce the impact of pesticide residues in/on specialty crops from being a barrier of trade for US grown exports.
  - **Department of Defense:** To prevent sickness/death within deployed U.S. military forces who are exposed to insect pests which transmits diseases to humans by facilitating the availability of public health pesticides.
  - **USDA-APHIS:** To perform collaborative research to combat invasive pests.
  - **USEPA:** To review IR-4 submitted data to help with their priorities to provide new technology to reduce the risk from pesticides.
  - **Department of Commerce/OMB:** IR-4 is involved in a critical project supporting the US-Canada agreement to accomplish key objectives of the Regulatory Cooperation Council.
- 4) IR-4 food residue research often takes 3 to 5 years to complete, involves highly trained staff that are proficient with USEPA's Good Laboratory Practices regulations, and requires expensive analytical instruments. This is vastly different from NIFA's typical research grants. Restructuring or eliminating IR-4 and abandoning numerous ongoing studies would be extremely expensive and a waste of already appropriated taxpayer money.

5) Investment in IR-4 has yielded a huge return on investment. Since its inception, IR-4 has facilitated the registration of over 25,000 crop uses. The Michigan State University Center for Economic Analysis (Dec. 2011) determined that for a total budget of \$18 million (USDA-NIFA and other public/private sources), IR-4 efforts contribute over **\$7.2 BILLION** to annual US Gross Domestic Product and supports **104,650 US JOBS**.

These comments are on behalf of the 82 undersigned commodity associations/grower groups and individuals who represent American specialty agriculture. Collectively, we represent growers with operations in almost every Congressional district of every state. Our operations are a huge driver in American agriculture; the farm gate value of specialty crops is over \$67 billion annually. For more information on this topic and on us, please see [www.saveir-4.org](http://www.saveir-4.org).

In summary, the proposed consolidation of the IR-4 Project into the Crop Protection Program significantly hurts growers of food and non-food specialty crops and our food systems. It will lead to higher prices for the food that enhances health, and plants that enhance the environment. Consolidating IR-4 with the proposed Crop Protection Program will substantially increase costs to the taxpayer or result in a much smaller program providing significantly less service to American growers and ultimately the American public. We urge the House Appropriations Committee - Subcommittee on Agriculture, Rural Development, Food and Drug Administration, and Related Agencies to continue to dedicate at least \$12 million net dollars for Minor Crop Pest Management (IR-4) in FY 2013 USDA-NIFA Research and Education Activities. Simply put, the U.S. specialty crop growers ask Congress to let the IR-4 Project continue to do the excellent job it has done for the past 49 years.

Sincerely yours and on behalf of the Friends of IR-4

A. Richard Bonanno, Ph.D.

The following commodity associations/grower groups support the above written testimony:

*(While looking at this list, consider the breadth of crops, regions and states represented.)*

Ag Matters, LLC	National Barley Growers Association
American Farm Bureau	National Greenhouse Manufacturers Association
American Mushroom Institute	National Onion Association
American Nursery & Landscape Association	National Potato Council
Ball Horticultural Company	National Watermelon Growers Association
California Apple Commission	NC Commercial Blackberry & Raspberry Growers Association
California Asparagus Commission	NC Pickles Packers Association
California Blueberry Commission	NH Vegetable & Small Fruit Growers Association
California Garlic and Onion Research Advisory Board	New England Vegetable & Berry Growers Association
Cherry Marketing Institute, Inc.	North American Blueberry Council
Center for Applied Horticultural Research	North American Greenhouse/Hothouse Vegetable Growers Association
Cranberry Institute	North American Strawberry Growers Association
Dill Growers of Oregon and Washington	North California Garlic & Onions Growers
Engage Agro USA	North Carolina Blueberry Council
Essex County Fruit Growers	North Carolina Nursery & Landscape Association
Florida Blueberry Growers Association	North Carolina Strawberry Association
Florida Fruit and Vegetable Association	Oregon Blueberry Commission
Florida Strawberry Growers Association	Oregon Essential Oil Growers League
Ginseng board of Wisconsin	Oregon Fine Fescue Commission
Great Lakes IPM, Inc.	Oregon Hop Commission
Hawley's Florist	Oregon Mint Commission
Hoogasian Flowers, Inc.	Oregon Ryegrass Commission
Hop Growers of Washington, Inc.	Oregon Seed Council
Hop Growers of American, Inc.	Oregon Tall Fescue Commission
Idaho Grain Producers Association	Pacific Northwest Christmas Tree Association
Idaho Hop Commission	Pacific Northwest Vegetable Association
Idaho Hop Growers Association	Pickle Packers International
Idaho Sugar Beet Growers Association, Inc.	Rudd Farm
Iwasaki Bros, Inc.	Society of American Florists
Kona Perfect Estate Grown Coffee	Texas Citrus Mutual
Lavender Growers of Oregon	Texas Vegetable Association
Maine Vegetable & Small Fruit Growers Association	Tulelake Growers Association Mint Research Advisory Committee
Massachusetts Fruit Growers Association	U.S. Apple Association
MGB Marketing	U.S. Dry Pea & Lentil Council
Meister Media Worldwide-Publisher of	U.S. Hop Industry Plant Protection Committee
-American Western Fruit Grower	Washington Asparagus Commission
-American Vegetable Grower	Washington Blueberry Commission
-Florida Grower	Washington Hop Commission
-Greenhouse Grower	Washington Mint Growers Association
-CropLife	Washington Red Raspberry Commission
Michigan Asparagus Advisory Board	Washington State Commission on Pesticide Registration
Michigan Cherry Committee	Western Alfalfa Seed Growers Association
Michigan Mint Growers Association	Wisconsin Mint Industry
Minor Crop Farmers Alliance	Wisconsin Muck Farmers Association
Mint Industry Research Council	
Montana Mint Committee	
Nash Produce	
National Asparagus Council	

For more information, go to [www.saveir-4.org](http://www.saveir-4.org)