



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

April 27, 2012

Dr. Meryl Broussard
Deputy Director for Agriculture and Natural Resources
National Institute of Food and Agriculture
U.S. Department of Agriculture
STOP 2220, 1400 Independence Avenue SW
Washington, DC 20250-2220

Re: NIFA-2012-0006

Dear Dr. Broussard:

IPM Voice supports the administration's proposal to combine key IPM functions and funding lines into one consolidated program, contingent on the allocation of additional dollars to compensate for the loss of approximately \$4 million in operating funds represented by new indirect allowances in the budget proposal. We agree that consolidation provides benefits including management efficiencies, greater visibility and critical mass.

The new program would allow 30% indirect costs to be charged to program activities by the host institution. To date, the programs in question have not had to pay indirect costs, or have paid less than 30%. Functionally, this represents a \$4 million decrease in operational funds for these programs.

We appreciate the value of the IR-4 program to IPM and understand the desire expressed by IR-4 and its stakeholders to not be included in the consolidated crop protection budget line. We expect that if IR-4 is not placed in the new Crop Protection Program, the IPM funds planned for the new program will not be diminished. In any case, we anticipate continuing collaboration with IR-4 and its stakeholders to advance IPM.

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We recommend that the following functions be continued under the new Crop Protection Program:

- State coordination of IPM programs.
- Support for regional collaboration and coordination of IPM projects.
- Ability to gather stakeholder priorities and respond to their needs.
- Regional grants programs to support research, education and extension projects, including working groups and small grants programs.
- Regional and state-based information networks to respond to regulatory, pest and endangered species related issues.
- Ability to provide education and outreach to stakeholders.

In addition to our request that additional dollars be allocated to compensate for losses incurred by indirect costs, we ask that a minimum of \$7 million of Agriculture and Food Research Initiative (AFRI) funds be reserved for IPM to ensure resources are available for IPM research and systems-level projects. This request represents the approximate amount of research dollars lost due to cuts in IPM funding since 2000. We request that NIFA report annually on AFRI and Specialty Crop Research Initiative funding used for IPM projects or IPM portions of projects.

Finally, given USDA's obligation to implement Integrated Pest Management programs under Section 303 of the Food Quality Protection Act of 1996, we ask that the Crop Protection Program name be changed to the Integrated Pest Management Program.

We look forward to working with the administration and others to ensure that the new program is defined and structured appropriately, properly funded and effective.

Sincerely,



Thomas A. Green, Ph.D.
Chairman, IPM Voice Board of Directors

cc: IPM Voice Board of Directors:

Jerry Baron
Executive Director, IR-4

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