



Florida Department of Agriculture & Consumer Services
BOB CRAWFORD, Commissioner
The Capitol • Tallahassee, FL 32399-8800

July 24, 2000

Please Respond to:

The Honorable Bill Clinton
The President
The White House
1600 Pennsylvania Avenue
Washington, District of Columbia 20500

Dear Mr. President:

I am writing to clarify some issues concerning Asiatic-Citrus Canker recently brought to your attention by the lime industry in South Florida in a letter to you dated July 18. The Florida Department of Agriculture and Consumer Services (FDACS), in cooperation with the United States Department of Agriculture (USDA), have an aggressive effort underway to eradicate citrus canker from this region. The consequences of allowing this devastating bacterial disease to take over our State are too great to allow any misinformation concerning the eradication effort and the Florida Department of Agriculture and Consumer Services to go unchallenged.

The citrus canker discovery in the 1980s was not mis-diagnosed. Department employees were aware that it was not Asian strain canker, but there was no science at the time to indicate that this strain of citrus canker would not spread and cause serious economic harm to Florida's citrus. That discovery came after additional research was done, within a one-year time frame, and the citrus growers were fairly compensated for the losses that occurred in the interim. Now, as in the past, eradication, quarantine, and rule-making decisions are made based on the most current, sound science available. In keeping with the facts, it is also important to note that the discovery of Asian Strain citrus canker in 1986 was in Anna Maria Island, Florida, and other areas in Manatee County, and later one property in St. Petersburg as indicated in the letter from the lime growers.

The Citrus Canker Eradication Program (CCEP) in Manatee County in June 1986 was very successful in reducing the incidence of citrus canker to a non-detectable level. The FDACS was interested in continuing citrus canker surveys in the Manatee County area; however, funding for this purpose was not supported.



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Eradication Efforts

The FDACS launched an eradication effort immediately following the discovery of citrus canker near the Miami International Airport in 1995. Wind-borne rain is one of the principle carriers of citrus canker and Miami-Dade County has had an abundance of tropical storms, causing canker to proliferate in the area. It has never been determined that human movement of citrus canker caused the disease to move into the South Florida lime groves. However, it is very likely that it was moved from grove to grove via poor sanitation practices and lax security by certain segments of the industry. For example, many of the groves were without fences and easily accessible by the public. There were no visual indications of decontamination procedures for personnel and/or equipment entering and departing many of the groves. In addition, certain custom equipment was used in multiple groves without thorough decontamination. Although extensive research is underway to find better detection methods, currently the only method is observing the lesions on the tree. The Department is involved in numerous research projects that will allow earlier detection of citrus canker. Unfortunately, the scientists say many of these possibilities are potentially years down the road.

Time of Response

Infected citrus trees were not 'allowed' to sit in the middle of lime groves unless there were problems in determining ownership or other due process problems. The Department can not take regulatory action without the proper legal notification and in several cases was impeded in efforts to determine the name of the grove owners. In most cases, the Florida citrus growers have been cooperative in working with the CCEP to remove citrus canker infected trees. The CCEP has not enjoyed this same cooperation from some lime growers. In fact, in some cases, misinformation was supplied to program personnel that impeded the program. Incorrect names were provided by lime grove managers and Department employees were denied access to the lime groves until they could determine the correct names after numerous visits and phone calls. In an effort to expedite the removal of infected trees, the CCEP now asks grove owners for permission to remove the infected trees even before the legal paperwork is generated.

Quarantine Zones

The Department must also follow the proper legal channels for establishing quarantine zones. Quarantine zones are not established until delimiting surveys have been conducted to determine exactly where the lines should be drawn, the proposed zones are published, and a rule-making process has been completed. Because quarantine zones create a regulatory impact on growers, it is important that the boundaries be based on facts and not drawn arbitrarily. The lime industry was alerted well in advance that a quarantine zone was being established.

While the new quarantine zone inadvertently omitted a piece of land with five groves, each grove was immediately put under an individual quarantine. It is interesting to note that the lime industry was concerned about the perceived delay in establishing a quarantine zone. Prior to the discovery of canker in the lime groves, industry representatives resisted the extension of the quarantine zone to all of Miami-Dade County due to the impact on their ability to sell limes within the state of Florida. Had the quarantine zone been extended earlier, grove surveys would have been increased from once a year to every 90 to 120 days. If that had been the case, it is highly likely the Department would have discovered the disease in its initial stages of development. The Department also convinced the USDA to allow growers to sell their limes within the quarantine zone and to other non-citrus producing states, thereby protecting a significant portion of their market.

Public Information Effort

The CCEP also has an expansive public information and education program. Our public information teams hold community meetings, meet with State and local government officials to keep them updated on the progress of the eradication effort, respond to every citizen complaint, and distribute written materials about citrus canker and the eradication program throughout the South Florida region. There is daily contact with the media, including radio, television, and newspapers. We have also purchased billboards alerting the public to the presence of canker and asking people not to move citrus material out of the quarantine zone. In addition, the CCEP has a consumer help line to answer any questions the public and industry may have. Initially, the help line had four operators and some callers did get a busy signal. However, we quickly addressed the problem. As the eradication effort has expanded, so too has the help line. The CCEP help line now has eight full time operators and is in the process of hiring eight more. A new, more customer friendly phone system has also been purchased and installed. It allows us to track consumer calls to ensure questions are answered and problems are resolved. The Department also provides the citrus industry with a weekly update on the progress of the eradication effort in every impacted area of the State. When the help line is fully staffed, the public relations program will employ 27 people. Clearly this indicates a commitment to public education. For the lime growers to indicate in their letter that issues involving China trade have had any impact at all on public education is incorrect and completely out of line. The Chinese trade delegation has had no concerns about citrus canker at all. During trade negotiations with China, questions were raised solely about fruit fly infestations.

Risk Assessments

The risk assessment program is to enable growers to provide scientists with pertinent information to determine whether cutting at 1,900 feet is necessary. In a few cases, a lesser cutting zone was approved because of mitigating circumstances. For example, one infected grove was located more than 20 miles from the nearest grove and the only citrus trees allowed to remain are of a variety considered less susceptible to citrus canker. There have been at least four formal risk assessments of lime groves in Miami-Dade County. In all cases, each was carefully reviewed, and with the exception of a small rootstock trial planting, it was determined that infected and exposed tree removal was required out to a distance of 1,900 feet. A key factor in the risk assessment recommendations that made it difficult to reduce exposed tree removal was the high level of disease-causing bacteria and wide distribution within the southern tier of the lime production areas. The leadership within the CCEP looked at numerous other lime groves and determined formal risk assessment to be futile based on the amount and/or distribution of disease in the area. There has never been a set of circumstances that would have qualified lime growers for a variance in the 1,900 foot cutting zone.

Concerning the validity of Dr. Gottwald's, et al., citrus canker epidemiological research work that is in prepublication form, it is important to point out that it has been reviewed by several of the world's leading plant disease epidemiologists. Dr. Garth Hughes, of the University of Edinburgh, Scotland, and a leading expert, has working closely with Dr. Gottwald in the analyses of his data, and if anything, feels it may be conservative in its conclusion. As the research work has passed the initial scientific peer review, it is very appropriate to put it to good use. Regarding Dr. Gottwald's reluctance to share prepublication copies of this work, it is common practice in the scientific community as authors prefer to distribute final copies rather than draft copies of their findings for general distribution.

The 1,900 foot cutting zone is neither arbitrary nor capricious. The decision to cut citrus trees within 1,900 feet of an infected tree was made following year-long scientific research that indicated the canker bacteria can spread more than 4,000 feet during storm activity. However, 95 percent of the bacteria falls within 1,900 feet, so it was decided with input from the scientists that this was the most conservative cutting zone possible without putting the eradication effort in jeopardy. It was apparent after the completion of this research that the previous policy of cutting at 125 feet was woefully inadequate. This research was conducted in Miami neighborhoods, not in a laboratory. The potential for movement of canker by animals, meter readers, garbage collectors, and lawn maintenance workers was indeed taken into account. We support the research that was carried out by scientists expert in the field of citrus canker. The problem would be no different in a grove situation. Because wind-borne rain is a predominant carrier of citrus canker, the fact that groves can be fenced and secured

The Honorable Bill Clinton
July 24, 2000
Page Five

FLORIDA CITRUS OUTLOOK

against unauthorized entry does little to mitigate the spread of the disease. In fact, research conducted in 1989 by Dr. Tim Gottwald (USDA, Agricultural Research Service) on the Smoak Grove in Highlands County indicated that a 1,900 foot cutting zone was necessary for successful eradication. The lime industry has indicated that field trials would give lime growers the confidence that is currently lacking in the eradication program. The year-long research was done in the field. Unfortunately, given the subsequent spread of citrus canker, additional field trials would only put the citrus industry at further risk of infection.

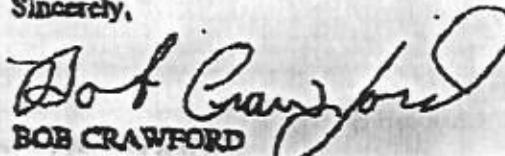
Survey Program

Presented to:
THE FLORIDA CITRUS COMMISSION

The CCEP's survey program involving visual inspection is the only reliable method at this time. I have already mentioned that the Department is involved in and strongly supports any research to find a cure for citrus canker, but at the very least develop more effective methods of detection. Research on such projects as citrus canker sniffing dogs and aerial detection using spectral imaging are a top priority. We are very excited about the prospect of improved detection capabilities but must use the technology available at this time until these projects come to fruition.

I realize the lime industry is under a great deal of pressure and has many concerns about the citrus canker infestation. However, the FDACS is committed to eradicating this destructive disease from the lime groves and throughout the state and appreciates your administration's support throughout the program. Millions of dollars and man-hours are being spent on this very important effort and I am confident we will succeed with the continued support of the Federal government and the citizens of this State.

Sincerely,


BOB CRAWFORD
COMMISSIONER OF AGRICULTURE

cc: The Honorable Jeb Bush
The Honorable Dan Glickman
Florida Congressional Delegation
Mayor Alex Paezlas
Commissioner Dennis Moss
Commissioner Kay Sorenson
Mr. Craig Wheeling
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