The National Institute of Food and Agriculture (NIFA) solicited formal stakeholder comments from the public on the proposed Crop Protection and Pest Management (CPPM) program in the spring of 2012 through four stakeholder listening sessions (two in-person and two webinars) and through subsequent meetings and conference calls. NIFA received comments from over 90 groups and individuals representing universities, commodity groups, grower associations, industry, and private interests. NIFA took this stakeholder input into consideration when developing the first CPPM program and the Crop Protection and Pest Management Competitive Grants Program in fiscal year (FY) 2014.

Individual written comments submitted for the listening sessions can be found at www.regulations.gov/#!documentDetail;D=NIFA-2012-0005-0001. Below is a synopsis of stakeholder input. The comments from a significant number of individuals included:

- The general sentiment that current NIFA integrated pest management (IPM) program areas that are effective should be continued in the CPPM program.
- Support for the scope of the proposed CPPM program.
- Endorsement of the regional deployment model for IPM as a proven concept, but with the added concern that a portion of CPPM program funding should be reserved to address issues of local and national need.
- Favorable recognition of CPPM program priorities that addressed growing IPM needs, such as the development of the next generation of IPM scientists and professionals (CPPM focus area on the Development of the Next Generation IPM Scientists) and the need to apply IPM principles in urban and other non-traditional settings (CPPM focus area on IPM for Sustainable Communities).
- Recommendations for the new CPPM program to enhance coordination and improve efficiency of the national IPM portfolio of programs.
- Concern that the use of the Section 406 authority of AREERA for the CPPM program would allow the recovery of indirect costs on project awards that previously did not allow recovery of indirect costs. This would result in the loss of up to 30 percent of funds available for project activities.
- Concern that the Section 406 authority would expand eligibility for the CPPM program to all four-year degree-granting institutions without increasing the funds available. This would likely lead to greater competition for an already insufficient pool of funds to address the most critical IPM needs.

Other stakeholder comments addressed the following topics:
Some stakeholders directly addressed the IPM research agenda and stated that the scope of the current IPM research programs is appropriate, but encouraged further research support for non-traditional areas such as microbial biological control.

Several stakeholders and university partners noted gaps in current IPM programs and supported CPPM focus areas that identified and addressed these growing gaps in IPM programming. Stakeholders expressed considerable concern and interest in the development of the next
generation of IPM scientists and professionals (CPPM focus area on the Development of the Next Generation IPM Scientists). The agricultural industry particularly favored the opportunities.

Stakeholders provided favorable comments acknowledging that (1) IPM is a principle that can and should be applied throughout society, with applications in cities, schools, housing and structures and (2) that inclusion of these programs brings the IPM expertise available in the university system to bear against societal problems that affect human health and food security. These are settings where people work, live, and go to school. The CPPM focus area on IPM for Sustainable Communities would address this emerging need in community IPM. A number of agricultural issues are growing in significance because IPM monitoring has not been focused in population centers. A few recent examples include emerald ash borer, Asian long-horned beetle, sudden oak death, *Ralstonia* in geranium, and late blight in tomato transplants. In these cases, more focused urban IPM programs could have reduced the risks to commercial agriculture, forestry, and natural resources.

Stakeholder comments indicated that the CPPM focus area for Enhancing Agricultural Biosecurity would fill another known gap in previous IPM programming.

While stakeholder comments indicated they were supportive of the overall concepts and focus areas of the CPPM program, they also expressed caution that NIFA should not expand to the full scope of the proposed new program without the appropriation of additional funding to properly address are focus areas.

A joint Agricultural Experiment Station and Cooperative Extension committee formed through the Board of Agricultural Assembly of the Association of Public and Land-grant Universities provided detailed input that (1) further reinforced the comments listed above and (2) emphasized several “essential elements” they felt were critical to the success of this program. These included: (1) an Extension Integrated Pest Management Coordination (EIPM-CS) program to work directly with agricultural producers, urban clientele, and other pest managers. They felt this program should provide education about sound pest management practices and focuses on locally-adapted, problem-solving, and integrate scientific expertise with outreach to engage stakeholders in IPM; (2) Regional IPM Centers to maintain critical linkages to local stakeholders through the IPM programs of participating states and territories, fund research and extension activities and broker information about IPM research, education and extension priorities for regions, commodities, and other environments where IPM is needed; (3) an Integrated Pest Management Pest Information Platform for Extension and Education (ipmPIPE) function to monitor the presence of pest problems of importance across a wide-area; (4) a competitive grant program that addresses all the purposes of former related NIFA programs such as Crops and Risk (CAR), Risk Avoidance and Mitigation (RAMP), Regional Integrated Pest Management (RIPM) and Pest Management Alternatives (PMAP); (5) a new Community IPM focus to address improved management of pests in the diverse range of environments that benefits all U.S. citizens where they live, work, learn, and play; and, (6) development of the next generation of scientists. This training would expand the capacity for science-based decision by pest management professionals critical to meeting today’s challenges. This last “critical element” would also include undergraduate internships, graduate student opportunities, and curriculum development. Further, this group advised that the new CPPM program should “enhance
coordination and improving efficiency” by an expanded and formalized stakeholder role in decision-making relative to the CPPM program.

Additional stakeholder input provided to the Agricultural and Food Research Initiative (AFRI) regarding applied pest management was also considered in the CPPM Competitive Grants Program, where applicable. Stakeholder input supported applied research on reducing microbiological pathogen introductions on fresh fruits and vegetables through (1) strategies including a suite of physical, chemical, and molecular tactics and (2) application of these novel approaches on a variety of crop plants under multiple environments. Stakeholders expressed interest in an ability to address management of noxious weeds and specific invasive species of concern that have limited distributions in the United States. Some stakeholders expressed support for the continued survey, detection and control of weedy pests. Other stakeholder comments supported the importance of developing new strategies for sustainable weed management, especially the development of resistance management strategies that address resistance to crop protection products. Stakeholders felt that bio-based pest management and IPM/system level research should be supported. Host plant resistance, host-parasite interactions, biological control of insects and other pests, and the application of transgenesis in pest management were other areas of stakeholder interest. Stakeholder comments also encouraged efforts to address recognition and mitigation of injury to fruit, vegetable and specialty crops caused by plant pests and diseases, with an emphasis on the most immediate threats to those crops.

The President’s Council of Advisors on Science and Technology (PCAST) report on "Agricultural Preparedness & the United States Agricultural Research Enterprise" (www.whitehouse.gov/sites/default/files/microsites/ostp/pcast_agriculture_20121207.pdf) released on December 7, 2012, recommended Federal investment in three main areas: research support, training and workforce development, and research infrastructure. The PCAST report also recommended an “emphasis on basic research as well as managing the risks associated with emerging threats such as new pests and pathogens, limited water availability, environmental impacts of agriculture on human and environmental health, or adaptation to a changing climate.” In line with the PCAST priorities, the CPPM program supports plant protection tools and tactics, diversified IPM systems, and enhanced agricultural biosecurity for the risks associated with emerging threats such as new pests and pathogens.

NIFA took this stakeholder input into consideration when developing the CPPM program and the Crop Protection and Pest Management (CPPM) Competitive Grants Program for fiscal year (FY) 2014.