



BEYOND PESTICIDES

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February 13, 2018

Kelsey Brantley

National Invasive Species Council Program Specialist and ISAC Coordinator

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Dear Ms. Brantley:

Re. Invasive Species Advisory Council Comments

These comments are submitted on behalf of Beyond Pesticides. Founded in 1981 as a national, grassroots, membership organization that represents community-based organizations and a range of people seeking to bridge the interests of consumers, farmers and farmworkers, Beyond Pesticides advances improved protections from pesticides and alternative pest management strategies that reduce or eliminate a reliance on pesticides. Our membership and network span the 50 states and the world.

The National Invasive Species Council (NISC) poses four questions for public input to the forthcoming meeting of the Invasive Species Advisory Council (ISAC). We find it most helpful to begin with the fourth: “How can NISC foster the development and application of innovative tools and technologies to enable the prevention, eradication, and control of invasive species in a more timely and effective manner?”

In order to address this question, NISC and ISAC need to first address the question, “What is an ‘invasive species’?”

“Invasive species” have frequently provided a reason for dispersing toxic chemicals in the environment, often with a sense of urgency and an assumed indisputable benefit. This unsupported (and sometimes unstated) assertion of benefit is a claim to virtue that allows environmental harm instead of preventing it.

Definitions and Why They Are Important

The anti-invasive species movement depends on a disconnect between the ecological meaning of “invasive” and the regulatory definition. Species that are truly invasive in an ecological sense are capable of invading and persisting in intact ecosystems. We should justly be concerned about the introduction and spread of species that are truly invasive because they have the ability to threaten biodiversity and native ecological communities. However, the regulatory definition has nothing to do with invasiveness. Executive Order 13751 provides the following definition: “‘Invasive species’ means, with regard to a particular ecosystem, a non-

native organism whose introduction causes or is likely to cause economic or environmental harm, or harm to human, animal, or plant health.”

FIFRA Definitions

2 (t) PEST.—The term “pest” means (1) any insect, rodent, nematode, fungus, weed, or (2) any other form of terrestrial or aquatic plant or animal life or virus, bacteria, or other micro-organism (except viruses, bacteria, or other micro-organisms on or in living man or other living animals) which the Administrator declares to be a pest under section 25(c)(1).

25(c) OTHER AUTHORITY.—The Administrator, after notice and opportunity for hearing, is authorized—

(1) to declare a pest any form of plant or animal life (other than man and other than bacteria, virus, and other micro-organisms on or in living man or other living animals) which is injurious to health or the environment;

2 (j) ENVIRONMENT.—The term “environment” includes water, air, land, and all plants and man and other animals living therein, and the interrelationships which exist among these.

Notice that this definition is essentially the same as —and is actually broader than in a literal sense— the definition of “pest” in the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA). As stated above, the definition of “invasive species” says nothing about invasiveness.

In the context of other federal, state, and local laws, the regulatory definition of “invasive species” gives broad authority to agencies to use all means at their disposal to rid the jurisdiction of non-native organisms causing economic harm, as well as harm to health and the environment. Many local ordinances that ban or restrict pesticide use make an exception for “invasive species,” presumably under the mistaken assumption that in doing so they are protecting the environment. Instead, they are allowing environmental harm through the spread of toxic substances.

The use of the term “invasive species” as a claim to virtue that is used to promote any and every attempt to exterminate any unwanted organisms is very disturbing. It is important to understand the problems that lead to the use of toxic chemicals, beginning with the cause. In the case of situations involving so-called “invasive species,” we find that few, if any, involve species that are truly ecologically invasive—that is, capable of invading and persisting in intact ecosystems. Instead, such situations usually involve species that can take advantage of disturbed habitats (“weeds” or “weedy species”). As such, the emphasis should be placed on

healing the disturbance (to which end, so-called “invasives” may sometimes be helpful), rather than killing the opportunist colonizer.

We do not take the position that such opportunist colonizers should never be removed or managed. We do believe that the decision concerning whether such action should be taken should be based on the situation at hand and not on a claim to virtue that makes extermination of non-natives a righteous cause.

Redefining “invasive species” to be limited to those species that can invade and damage intact ecological communities will directly “foster the development and application of innovative tools and technologies to enable the prevention, eradication, and control of invasive species in a more timely and effective manner” because resources will be directed only at those species that truly present an ecological threat. It will prevent those resources from being squandered in ways that are ecologically destructive.

The sharper focus that this redefinition will bring to the NISC and ASIC will enable them to explore approaches such as those that Beyond Pesticides has used in working with National Parks, local governments, and tribes to manage ecological problems in a way that is truly protective of biodiversity.

Thank you for your consideration of these comments.

Sincerely,

A handwritten signature in dark ink, appearing to read "Terry Shistar", written in a cursive style.

Terry Shistar, Ph.D.
Board of Directors