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PLANT INDUSTRIES

Jared K. Stuart
Section Manager, Field Services
Division of Plant Industries
Idaho State Department of Agriculture

October 17, 2014

Dear Mr. Stuart:

In early 2014 the Idaho State Department of Agriculture (ISDA) amended its rules regarding the planting of certain species that could carry pathogens affecting edible dry beans. The rules are found in IDAPA 02.06.25 titled "Rules Governing the Planting of Beans, Other than *Phaseolus* Species, In Idaho".

The new ISDA rules mean that none of the three species specifically mentioned (soybeans, mung beans, and adzuki beans), or any other species capable of spreading a regulated pest, can be planted in Idaho without a serology and a test for nematodes. The presence of any soil with or on the seed also disqualifies the lot from being planted in Idaho. These tests must be done regardless of the size of the seed lot. The ISDA also interpreted the rules to mean that even Idaho-grown seed of the non-*Phaseolus* species need the laboratory tests.

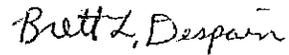
These new rules mean that research into non-*Phaseolus* beans has become a lot more expensive. Typical research plots in Idaho are done on trial grounds with less than 1 lb. of seed. Furthermore, trials may include many small seed lots. If each seed lot needs to have a serology test, the expense will total thousands of dollars. Because of the expense, research into non-*Phaseolus* beans may move elsewhere along with future potential production. Furthermore, it is unnecessary to do serological or other testing on Idaho-grown seed because it has already been inspected for regulated pests by ISDA or Idaho Crop Improvement Assn. Seed from outside of Idaho that is planted on a trial ground is also grown and inspected at some point before planting on the trial ground because the last thing a breeder wants to do is lose his trial ground due to the presence of a regulated pest.

One of the non-*Phaseolus* species being significantly impacted by the new regulations is *Vigna angularis* or adzuki bean. It is proposed that adzuki beans (*Vigna angularis*) be covered by the same trial ground regulations as *Phaseolus* species. Those trial ground regulations allow for the planting of a maximum of 1 pound per variety statewide in experimental plots without laboratory testing. This change will allow research involving this species to move forward while maintaining the protection now given by the new regulations.

There is also a possibility that garbanzos and chickpeas (*Cicer arietinum*) could fall into the category of "other species capable of spreading a regulated pest". It is proposed that this species either be specifically excluded from the new regulations, or that trial ground regulations also be extended to include this species in southern Idaho.

Please give these proposals prompt and fair consideration.

Sincerely,



Brett L. Despain,
Research Manager

CC: Lloyd Knight, Idaho Bean Commission