



IDAHO - EASTERN OREGON SEED ASSOCIATION

55 S.W. 5th Ave. #100 • Meridian, ID 83642 • 208-888-0988 • Fax: 208-888-4586

July 29, 2024

Idaho State Department of Agriculture (ISDA)
Attn: Lloyd Knight, Deputy Director
2270 Old Penitentiary Rd
Boise, ID 83712

Subject: Written Comments on the Proposed Listing of Palmer Amaranth to Idaho's Noxious Weed List

Dear Mr. Knight,

The Idaho Eastern Oregon Seed Association (IEOSA) convened virtually on July 17th to deliberate on the proposed listing of Palmer Amaranth to Idaho's Noxious Weed List. After careful consideration, the IEOSA voted to unanimously oppose this proposed listing.

The inclusion of Palmer Amaranth on the noxious weed list would present significant challenges, particularly in the area of seed testing. This is especially pertinent for small-seeded vegetable crops, such as carrot, onion, and lettuce. Due to the extremely small size of Palmer Amaranth seeds, it is challenging to separate them from other small-seeded crops during cleaning processes. The presence of Palmer Amaranth in seed lots would necessitate DNA testing to accurately identify the species, leading to potential delays in seed shipments from Idaho.

Our member companies are concerned that the listing of Palmer Amaranth would not only result in shipment delays but could also restrict the movement of seeds from Idaho. The discovery of Palmer Amaranth in seed lots, particularly those containing small seeds, would complicate the cleaning process and disrupt timely deliveries to customers.

The IEOSA aligns with expressed comments in previous rule-making meetings, advocating for education and outreach as the most effective strategy for managing this invasive species. We encourage the ISDA or another appropriate organization to spearhead efforts in educating and informing the agricultural industry about the impacts and management of Palmer Amaranth.

We appreciate the opportunity to provide our input on this important issue and hope that our concerns will be considered in the decision-making process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Roger Batt', is written over a horizontal line.

Roger Batt
Executive Director
Idaho Eastern Oregon Seed Association (IEOSA)