

December 1, 2008

Mr. Eugene M. Kelly
President, Florida Native Plant Society
PO Box 278
Melbourne, FL 32902

Dear Mr. Kelly:

We are in receipt of your November 14th letter concerning the use of *Jatropha curcas* as an energy crop.

Mr. Beckford is right in stating that *Jatropha curcas* has been in Florida for many years. Also, it has not been reported to be invasive. *J. curcas* has been assessed utilizing the IFAS Assessment for Non-Native Plants in Natural Areas and the result was, 'Not a Problem Species' (<http://plants.ifas.ufl.edu/assessment>). This assessment tool is used when a species is already in Florida. There is not a lot of data on the species, in spite of the fact that it has been in Florida for many years. In the Central and South regions of the state, there is still incomplete data.

You are correct when you indicate that *J. curcas* has been reported to be invasive in other regions of the world. Some have used a predictive assessment (Australia and Hawaii) that predicts it would be invasive if introduced. The problem with any predictive assessment, this one as well, is that there are false positives but the real issue is where on the continuum used in the predictive tool do you draw the line: invasive – not invasive.

You are also aware that the Florida Department of Agriculture and Consumer Services Division of Plant Industry (FDACS-DPI) regulates crops used for biofuel production. Landowners growing more than two acres must put up a bond (if it does escape, the bond covers the cost of control) and buffers around the plantings must be in place. *Jatropha curcas* has a large seed which would be harvested for biodiesel production and is not eaten by livestock. Mr. Beckford and other IFAS scientists are working with FDACS to make sure that all plantings are in compliance with the FDACS rule.

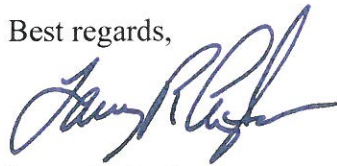
The IFAS Invasive Plant Working Group (IPWG) developed the 'assessment' tool and recently approved the use of the predictive tool. The predictive tool is about 'potential risk'. This is the same tool used in Hawaii and Australia. This assessment tool will be used for those plants that may be introduced into Florida's habitats. We are looking at when to use it and where to draw the line on the continuum. We are presently examining the biofuel crops deemed 'not a problem species' by the assessment tool for plants already in Florida and what happens if there is an increase in propagule pressure (increased planting of the crop). The

question being addressed is, “What would this increased propagule pressure mean with regards to potential invasiveness?” We are examining options. One suggestion is that if propagule pressure is increased and the predictive tool indicates that it may prove to be invasive, that we look into establishing Best Management Practices, BMPs, that reduce the risk of escape and then the crop be reassessed every two years. This would allow for ‘best management practices’ that we believe would reduce the risk of invasion to be put in place when the crop is grown. FDACS could then include the BMPs in their permitting process if they should choose. However, we will base our recommendations at that time on the data available to us. We agree that all current plantings of *Jatropha curcus* should be monitored, as all introduced species for new crops should be.

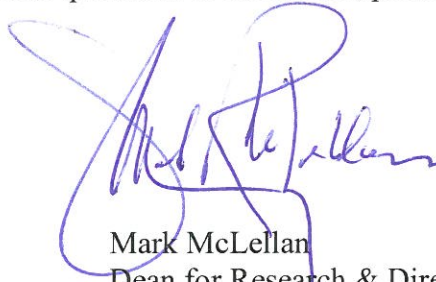
We are exploring many biofuel crops. We are committed to using the best science we have available to us in exploring alternative energy crops.

Thank you for your inquiry. If you have further questions or comments, please do not hesitate to contact us.

Best regards,



Larry Arrington
Dean for Extension & Director
Florida Cooperative Extension Service



Mark McLellan
Dean for Research & Director
Florida Agricultural Experiment Station

cc: Governor Charlie Crist
Charles Bronson, Florida Commissioner of Agriculture and Consumer Services
Welton G. Caldwell, Chairman, Lake County Commission
Ray Judah, Chairman, Lee County Commission
Matthew Baumann, Mayor, City of Groveland
Elaine Renick, Lake County Commission
Roy Beckford, Lee County Extension Agent
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Charlie Vavrina, District Extension Director, South Central District
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