



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Washington, D.C. 20240



August 31, 2005

In Reply Refer To:
DOI/FWS/DSA

Dear State Ginseng Coordinator:

Our CITES non-detriment finding for the export of American ginseng (*Panax quinquefolius*) harvested in 2005, issued on August 3, 2005, has resulted in some questions and misunderstandings that require clarification. Based on new information and further consultations with ginseng experts, we are also modifying our previous guidance on aging of roots.

With our finding, we increased the minimum age for exports of wild American ginseng to 10 years while maintaining a minimum age of 5 years on woods-grown and wild-simulated ginseng. In our finding, referred to 10-year-old plants as having four leaves, or prongs, and we provided information from three published sources regarding the aging of plants in the field based on numbers of leaves. We wish to clarify that the Fish and Wildlife Service does not regulate the harvest of ginseng, and the information relating numbers of leaves to age was only meant to serve as a guide to diggers to be able to age plants in the field before digging. We did not intend to impose a Federal requirement for a minimum number of leaves on ginseng at the point of harvest. We note, however, that a number of States do have such requirements as a result of our previous minimum-age requirement of 5 years, imposed in 1999-2004. We are aware that the number of leaves may vary, even for plants of the same age. For export purposes, roots are aged at the time of export based on the number of bud-scale scars, not leaves. Furthermore, we have in the last week received new information (J. McGraw, pers. comm.) indicating that most 10-year-old plants can be expected to have no more than 3 leaves (i.e., 3 prongs).

Regarding aging of ginseng roots, in our finding we advised that roots from 10-year-old plants should possess 10 bud-scale scars, just as we had previously advised that roots from 5-year-old plants should have 5 scars. After a further review of the literature, coupled with information provided by ginseng experts, we are revising this guidance, so that wild roots (10 years old or older) must possess a minimum of 9 bud-scale scars, and woods-grown and wild-simulated roots must have at least 4 bud-scale scars. This allows for the fact that, during their first year of growth, ginseng plants do not form a bud-scale scar. We acknowledge that wild ginseng seed typically is sown, through natural dispersal or planting by diggers, 18–20 months prior to actual germination, to allow for the stratification process required by the species. However, seeds may lie dormant for even longer than 18-20 months (i.e., as part of a seed bank), so wild plants can only be aged practically based on the year when they germinated, not when they were sown.

We appreciate the feedback we have received to improve and clarify the information we are using to make our finding, and to provide more accurate information to the States and other stakeholders. If you have any further questions about this finding, please do not hesitate to contact me (telephone, 703-358-1708; or e-mail, scientificauthority@fws.gov). For questions on permit procedures, please contact the Division of Management Authority, 4401 North Fairfax

Drive, Room 700, Arlington, Virginia 22203 (telephone, 703-358-2104; or e-mail, managementauthority@fws.gov).

Sincerely,

/s/ Robert R. Gabel

Robert R. Gabel
Chief, Division of Scientific Authority