



August 9, 2016

Regulatory Analysis and Development, PPD  
APHIS, Station 3A-03.8  
4700 River Road Unit 118  
Riverdale, MD 20737-0092

Re: Docket No. APHIS2014-0092 – Importation of Fresh Lemons from Northwest Argentina into the Continental United States

Western Growers is an agricultural trade association representing California, Arizona, and Colorado growers, packers, and shippers of fresh fruit vegetables, and tree nuts, including citrus.

This statement is in opposition to amending the fruits and vegetable regulations to allow the importation of lemons from northwest Argentina into the continental United States.

Based on the pest risk assessment, there are 9 pests associated with Citrus spp. in Argentina, which were determined to be of quarantine significance for the United States. Of these pests, four of the pests are considered to have a high pest risk potential *Ceratitis capitata*, *Cryptoblabes gnidiella*, and *Gymnandrosoma aurantianum* are rated high. The other five pests identified are considered by APHIS to have a medium risk potential.

APHIS acknowledges that measures beyond standard port-of-entry inspection would be vital to mitigate risks. APHIS further claims that in proposing an amendment to the regulations to allow the importation of lemons from northwest Argentina a systems approach would be required.

Western Growers in its previous submission requested APHIS grant a minimum 120 day extension to the comment period. The purpose for requesting additional time was based on the fact that the current pest risk assessment was performed nearly ten years ago, and we believe that it is not in any manner representative of the current citrus growing conditions in northwest Argentina. Further, APHIS has stated that it was scheduling additional site visits. We would hope that the subsequent site visit would provide both APHIS and our industry with a more realistic picture before rendering any decision.

To the great disillusionment of Western Growers and other industry stakeholders, APHIS ignored the industry plea by providing us with only a 30-day extension, basically shifting the responsibility of APHIS onto industry. California and Arizona are the major producing states of lemons and other citrus commodities. The industry has been subjected to numerous pests and is currently fighting a costly battle to protect itself against the Asian Citrus Psyllid and Huanglongbing Disease. It is



incomprehensible that APHIS would take such a position, when so many questions remain unanswered, and so little effort on the part of APHIS in providing assurance that it has done its required due diligence.

Regrettably, based on a questionable pest risk assessment and inadequate and inaccurate economic risk review, Western Growers cannot support this proposal. By moving forward with this proposal APHIS is placing our industry in a precarious situation, as APHIS has failed to demonstrate to the industry that it has, in any manner, adhered to its commitment to safeguard the California and Arizona agricultural industry against the risks associated with the entry, establishment, or spread of plant pests.

Very truly yours,

Ken Gilliland  
Director, International Trade