



California Citrus Mutual (CCM) is a voluntary citrus producers' trade association. Our membership consists of growers paying annual dues which enable the association to engage in education, information and advocacy on their behalf. Approximately 70% of the industry base financially supports CCM. We are commenting on the proposed rule because we believe it is flawed in the areas of invasive pest/disease introduction and economics.

"Farming looks easy when your plow is a pencil and you're a thousand miles from the corn field."

Dwight D. Eisenhower

We believe the quote above accurately summarizes why mistakes were made in the proposed rule allowing lemons from Argentina into the United States. Be advised that CCM totally supports the statements and supporting documents presented by the U.S. Citrus Science Council. Citrus Mutual finds fault with the proposal in three major areas.

One, the document totally ignores the ability of an invasive pest or disease developing in an urban setting prior to infiltrating a commercial citrus grove. Furthermore the document assumes that only lemons are subject to the issues described. Recent history clearly indicates the small populations of pest, or limited bacteria from a disease, manifest themselves in urban settings. ACP, HLB, the Tri-Flies and LBAM are just a few pests in recent times that started undetected in urban areas before migrating towards commercial settings.

The proposed rule focuses solely on the ability of pest or disease developing in a commercial area. That has happened of course. Witness the first detection of Citrus Black Spot in the middle of a Florida orange grove. That remains a mystery but what is not a mystery is that it continues to spread within commercial groves even though producers, assumingly, are treating for the disease. As has been pointed out repeatedly in California's effort to suppress, eradicate or find ACP and HLB the targeted audience is the urban setting in which over 60% of the homeowners have citrus trees in their yards.

Where is the analysis as to CBS, mites or some other problem originating in Los Angeles or Orange County after arriving in one of two major seaports in Southern California? How easy is it for contraband leaving the port, innocently enough, and the fruit being carried to a home while vectoring a pest or disease?

Two, the proposal seemingly relies upon dated information regarding the pest and disease complex in Argentina. In 2007 the California citrus industry was not battling ACP. In 2007 the industry had scale under control with a combination of beneficial insect and chemical applications. In 2007 Fuller rose beetle was considered a minor pest. In 2007 neonicotinoids were not the subject of controversy challenged by customers and government. A lot has changed in our industry during this decade. Why is it assumed nothing has changed in Argentina?

CCM does not accept the statement that a visit in 2015 ratifies the technical components of the proposal. A summary or trip notes were never made available to the public. Were the trip members policy oriented, entomologists or disease specialists. Did they understand

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citrus farming and packing operations? No doubt they were well intended but were the necessary skill sets on that visit?

Could this group determine whether a grove or block of fruit was being farmed for fresh consumption or processing? There is a considerable difference in terms of intensity and subsequently pest and disease control. Could this group determine whether a packing operation had their tanks balanced between water for cleansing and post-harvest material for disease control. Could they determine if packing lines were accurately detecting product and inspectors were adequately trained to determine black spot or scale?

Exacerbating this concern is the apparent willingness of USDA to send a technical team during the equivalent Spring months to Argentina to confirm what is written in the proposal. This concurrence ratifies our belief that the necessary skill sets were not on the aforementioned trip. Relying upon communications from the Argentine government during the past nine years is highly questionable. There was deterioration in relationships between the United States and the Argentina government. The Argentine government has been caught repeatedly being less than transparent about pests and diseases via many commodities.

As an example, CBS is reported to be under control yet the EU has reported over 17 detections upon arrival in that continent. What did they miss? CCM is not interested in subjecting this industry to a mistake. Did the EU capture all the CBS detections? Did the growers or packing houses adhere to the protocols? What was missed and who missed it? Like HLB in Florida, Mex Fly in Texas, LBAM in Northern California; something was missed and who is paying the consequences?

Three, a layman with produce industry experience will easily detect the flaws in the economic component. Argentine lemons will directly compete with California lemons. That critical error undermines the entire economic impact argument. Furthermore the Department has repeatedly misrepresented economic impacts as it relates to the California citrus industry. In the past two decades there have been a myriad of proposals allowing citrus into the United States during alleged "off-season" shipment periods. The USDA economic team has repeatedly stated insufficient or minimal impacts. Why? Because they assess total citrus tonnage ignoring that the majority of Florida tonnage went for processing whereas most of the imported product was destined for fresh consumption.

The result has been the demise of the California summer orange program. A 50,000 acre industry has been reduced to miniscule 19,000 acres because off-shore competition enters the country at optimum price points. Asking our industry to once again concede that an economic analysis prepared by the Department as it relates to fresh citrus marketing is sound is asking too much.

Furthermore the report argues that should displacement occur it will occur via impacts on other exporting countries, nominally Mexico and Chile. Again, that assumes our industry is not shipping domestically; wrong! Secondly, never in our 50 year fresh produce marketing history have we ever witnessed a product marketer willingly give up shelf space. A battle for market share ensues and that battle occurs with price. It takes a minimum of three seasons for an outcome to be identified. Does the Department honestly believe that those engaged in the Mexican or Chilean supply chain are going to acknowledge the onset of Argentine fruit and willingly stipulate: "here comes Argentina I guess we should give up our market share." Re-read the Eisenhower quote above.

The USCSC economic attachments speak a language that is best understood by economists. Fresh produce marketing in reality is as we describe above. The Department's analysis is just wrong.

CCM has long been supportive of trade and understands the two way street that should exist. There are a myriad of examples within our citrus history in which we have never stood in the way of additional competition. Our first foray was the Israeli Free Trade Agreement. Since then Japan, Australia, South Africa, Uruguay, Peru and Chile have sought entry and those efforts were not opposed. Only when pests and diseases are prevalent have we questioned the effort; such as South African expansion in 2014, Spain a decade ago and Argentina in 1998.

Citrus Mutual believes the Department should simply shut down this effort, travel to Argentina and report back what they learned to industry. The technical group should have a skill set that encompasses all the dynamics mentioned above. Then, and only then, should a proposed rule be put forth to the industry. The role of APHIS is to protect domestic agriculture; not to fast track imported product from a known pest and disease infested area.

Respectfully Submitted by Joel Nelsen, President of California Citrus Mutual

A handwritten signature in black ink, reading "Joel Nelsen". The signature is written in a cursive, flowing style with a large initial "J".