

CALIFORNIA AVOCADO COMMISSION POSITION STATEMENT REGARDING USDA PROPOSAL TO EXPAND THE MEXICAN AVOCADO IMPORT PROGRAM

The California avocado industry is deeply concerned about a recently released Proposed Rule aimed at expanding the Mexican avocado import program. USDA's latest proposal would allow for year round shipping of Mexican avocados to all 50 states. To date, Mexico has been granted access to 31 states during the period from October 15 through April 15, due to the continued presence of insect pests in the Mexican growing region.

One of these pests is the Mexican fruit fly. USDA now maintains that the risk of Mexican fruit fly infestation of Hass avocados is much lower than originally believed, based on research conducted in Mexico in 2001-02. This has led USDA to conclude that it is safe to ship Mexican avocados to states with substantial production of citrus and other crops that are vulnerable to fruit fly attack, such as Texas and Arizona. Although experts believe that there are significant infirmities in the research and USDA's reliance on this single scientific study is not well founded, it is the very real threat of infestation by avocado-specific pests that most alarms California growers.

USDA admits that certain avocado pests—particularly the stem weevil—remain abundant in Mexico, as evidenced by the hundreds of insects detected during pest surveys since the import program first began. But seven years of Mexican avocado shipments to the U.S. without a pest problem have convinced USDA that its risk mitigation measures are working, therefore making it safe to ship Mexican avocados to California, Florida, and Hawaii—states where avocados are grown.

California growers know that Mexican avocados are not subject to treatments—like cold temperature protocols or hot-water dips used on other tropical products such as clementines and mangos—to ensure the mortality of insect pests. Instead, USDA relies on fruit cutting and pest surveys to eliminate problem groves from the import program. Growers know, too, that the import program has expanded each year since shipments first began, and that there has not been a commensurate increase in USDA resources deployed for risk mitigation activities. It is only a matter of time, therefore, before a shipment with stem weevils escapes detection. Allowing that shipment into California, where the insects could become established, spells disaster for avocado growers. The past performance of the import program simply is not a reliable indicator of its future success.

California growers have first hand experience combating insect pests from Mexico---at a cost of millions of dollars annually. Species like the Persea mite and avocado thrips first arrived from Mexico and became established in California during the 1990s. Now, growers spend \$8 to \$10 million each year trying to keep these insects under control. Another pest from Mexico would literally force many small family farms out of business.

USDA's record on avocados is decidedly one-sided. California growers have been trying to gain access to the avocado market in Mexico since 1998, yet still no fruit has crossed the border. Rather than assist U.S. growers in the dismantling of the false trade barriers Mexico has erected, USDA has steadily worked with Mexican officials to open up the U.S. avocado market by designing protocols, facilitating research, and giving in to the hardball tactics used by the Mexican government to secure trade deals.

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