May xx, 2024

Plant Pest Risk Analysis (PPRA)

Science and Technology (ST)

Plant Protection and Quarantine (PPQ)

Animal and Plant Health Inspection Service (APHIS)

United States Department of Agriculture (USDA)

920 Main Campus Drive, Suite 400

Raleigh, NC 27606

Dear APHIS:

I grow avocados on xx acres in City, California and am submitting these comments in response to the agency’s risk management document “Importation of fresh avocado fruit (*Persea americana* var. Hass) from Guatemala into the United States for consumption” dated March 13, 2024. I have several concerns about the proposal to allow the importation of Hass avocados from Guatemala.

As the document acknowledges, Guatemala is home to numerous serious pests of avocados, in particular the avocado seed weevil (*Heilipus lauri*) and the avocado seed moth (*Stenoma catenifer*). Either of these pests, if introduced into the U.S. would be catastrophic to the California avocado industry. California avocado growers pride themselves on their low pesticide usage and heavy reliance on biological control for the few pests that we do need to manage. The introduction of a new pest such as those listed in the document would result in unprecedented levels of pesticide use by California avocado growers destroying our reputation and likely our industry.

Although all the pests listed in the document have been determined to have only a low or medium likelihood of introduction, it is worth noting that the major pests that California avocado grower must manage — avocado thrips, Persea mite and the avocado lace bug — have all been introduced from other countries. In fact, avocado thrips (*Scirtothrips perseae*) was a completely unknown pest of avocados in Mexico when it was discovered in California in 1996. This begs the question; how can APHIS be confident in allowing the importation of avocados from Guatemala when there may well be unknown pest species that will not be monitored? These pests must be discovered in their native countries, not once they devastate our domestic avocado industry.

The systems approach outlined in the document will be exclusively reliant upon the National Plant Protection Organization (NPPO) of Guatemala for monitoring and enforcement. I believe this is extremely risky, perhaps even reckless, for USDA to not have “boots on the ground” in Guatemala monitoring and enforcing the rules of this trade agreement. I again refer to three pests mentioned previously — avocado thrips, Persea mite and avocado lace bug — which were all introduced from Mexico, a country where the USDA has employees in country monitoring the avocado program activities. If pests can be introduced when USDA employees are present in the exporting country how can there be any confidence that the exporting country themselves will do a better job? I ask that APHIS implement the requirement of a quarantine period or fumigation treatment for imported Hass avocados from Guatemala to mitigate the potential risks.

California is already the highest cost producer of avocados sold in the U.S. Since avocado imports have been allowed, we have seen our market share eroded by large volumes of low cost imported fruit. We do not need more cheap avocados in the U.S. market that pose serious pest risks to our industry.

Sincerely,

Your Name

Your Contact Information