



April 17, 2020

The Honorable Sonny Perdue, Secretary
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC 20250

Re: Importation of Fresh Citrus From China Into the Continental United States

Dear Mr. Secretary,

On behalf of the Georgia Citrus Association, I write this letter to you for two purposes. One is to express our strong opposition to USDA's April 15, 2020 notice and decision to allow the importation of five species of fresh citrus fruit (pummelo, Nanfeng honey mandarin, ponkan, sweet orange, and Satsuma mandarin) from China into the continental United States (compiled under docket id: APHIS-2014-0005). And two, we ask that this decision be reversed immediately.

By way of background, the Georgia Citrus Association was founded in October of 2016 as a mechanism to support the development of the burgeoning citrus industry in Georgia, north Florida, and surrounding states. Since 2016, Georgia's citrus industry has grown to include 41 counties, 130+ growers, ~2000 acres, and ~300,000 trees. The weather and soils of the southern and coastal parts of Georgia provide a prime location for growing citrus, especially that of the satsuma mandarin, which is 85% of the 2000 acres Georgia farmers have planted. While anticipated farm gate value is not yet quantifiable, projected volume in year 2023 is 66M pounds. Each year planted acreage exponentially grows in Georgia as traditional row crop farmers are planting specialty citrus in hopes of making a living and saving their American dream. Although Georgia is currently a small part of the large world of citrus, every state counts and every farm matters, so please listen further.

Per documents provided at the regulations.gov website, USDA, in accordance with its Animal and Plant Health Inspection Service (APHIS) regulations, process and protocol, announced on May 1, 2019, a notice for review and comment of a pest risk assessment (PRA) that evaluated the risks associated with the importation into the continental United States of these five species of commercially produced citrus fruit from China. During the 60-day period between May 1, 2019 and July 1, 2019, USDA received comments from Florida, California and Texas citrus producing organizations and private citizens opposing the importation of citrus from China citing primarily phytosanitary concerns about the accidental introduction of pests which would be detrimental to those states' agriculture. Of

note is that numerous comments were also provided prior to the May 1st notice (as early as 2014) by persons also opposing the importation of citrus from China citing similar phytosanitary concerns. Out of all the comments and letters provided to USDA opposing this matter, no one noted a primary concern regarding competition. Their pleas were simply to ask for protection against disease/pest risks and to keep our food production stateside.

Per USDA, any prohibitions it places on the importation of fruits and vegetables will be based on scientific evidence, and will not be maintained without sufficient scientific evidence. Despite pages and pages of written concerns from those who actually grow citrus in the United States, not just scientifically study it, USDA concluded that the application of one or more designated phytosanitary measures by China would be sufficient to mitigate the risks of introducing or disseminating plant pests via the importation of these five species of citrus fruit from there. Further, in its 144-page January 14, 2020 PRA document, USDA wrote that some existing pests in China met the threshold to likely cause unacceptable consequences of introduction and action should be taken to mitigate that risk/pathway. In its decision to allow the importation of these citrus fruits from China, it appears USDA relied heavily on input provided by the national plant protection organization (NPPO) of China and its commitment to follow the appropriate international standards for phytosanitary measures to mitigate risk. In other words, USDA trusts China.

Leaving competition and food safety concerns out of this argument, the remote use of words such as “China”, “commitment”, “adherence”, “phytosanitary” and “sufficient” in a single paragraph to describe this situation is nothing short of scary and wrong. Florida’s citrus industry has been decimated; it has lost 70% of its production due to the introduction of the Asian Citrus Psyllid. While it is likely the introduction was accidental along a “secure channel”, it happened nonetheless. Look at where we are today with COVID-19-a virus from China. We cannot afford to be just sufficient in this decision. We cannot afford to rely on China’s commitment to adhere to the rules and protocols. We cannot afford to make our decision based simply on scientific evidence alone. We cannot afford to allow this at all. It is time USDA applies common sense to this equation, rather than mere “scientific” data.

Please protect this country, its people and the American citrus farmer by reversing this decision.

Respectfully,

Lindy Savelle

Lindy Savelle, President