



June 1, 2020

Mr. Kevin Shea  
Administrator  
Regulatory Analysis and Development  
USDA/APHIS PPD  
APHIS-2018-0091  
Station 3A-03.8  
4700 River Road Unit 118  
Riverdale, MD 20737-1238

Re: APHIS-2018-0091-0001 - Proposed Revision for the Importation of Fresh Citrus from South Africa into the US

Dear Administrator Shea,

The Georgia Fruit and Vegetable Growers Association represents producers in the Southeast specialty crop industry by providing a voice for Georgia and southeastern fruit and vegetable growers. Among our members are producers of citrus, a burgeoning industry in Georgia experiencing expansive growth with increased production acreage and over 100 farmers now producing high quality citrus products.

We are writing to express our strong opposition to the removal of port restrictions of citrus from South Africa. The risks from such an expansion to Georgia's growing citrus industry and vital fruit and vegetable crops are many. Georgia citrus producers, through cultural practice and regulatory oversight, have proactively managed to keep many citrus pests at bay. The introduction of foreign pests has the potential to irreversibly damage the industry, the investments of citrus growers, as well as damage traditional and established fruit and vegetable crops. Georgia's proximity to Florida's large citrus regions is also concerning should new pests find their way into the state.

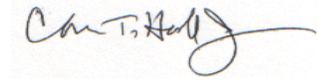
Georgia's climate, while well suited for both citrus and other food crops, is also prime habitat for potential pests which likewise pose risks to crops including, but not limited to, squash, melons, peppers, tomatoes, and peaches. Difficulty in both assessing and treating pests found in citrus producing areas of South Africa leaves Georgia growers exposed to an increased risk with little assurance that inspections at an expanded number of U.S. ports can effectively prevent these pests from being introduced domestically. Once here, treatment of pests poses both a potential economic hardship on growers as well as environmental concerns from additional pesticides.

South African citrus enjoys existing access to the U.S. market at ports above the 39<sup>th</sup> parallel where the introduction and spread of pests is far less likely. We support maintaining access north of this demarcation thereby limiting exposure to more southern production areas. Vigorous inspections,

treatment of imported products, and limiting ports provides a holistic approach that best minimizes risk to Georgia producers.

The Georgia Fruit and Vegetable Growers Association urges USDA/APHIS to carefully consider the negative impacts this proposal can have on Georgia's growing citrus industry and our fruit and vegetable producers.

Respectfully,

A handwritten signature in black ink, appearing to read "Charles T. Hall, Jr.", written over a light gray rectangular background.

Charles T. Hall, Jr.,  
Executive Director, [chall@asginfo.net](mailto:chall@asginfo.net)