



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,

We appreciate the opportunity to comment on the referenced matter of removing port restrictions and authorization of importation of South African citrus in all ports of entry in the U.S. Georgia Citrus Farmers are concerned USDA's proposed change to remove port restrictions could economically devastate not only the burgeoning citrus industry in Georgia, but also negatively affect other agricultural commodities within the state, as well as those in surrounding states.

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 42 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.

In USDA's commodity import evaluation document (CIED), the basis of the phytosanitary safety of the proposed rule change focused on the False Coddling Moth at four American ports and the ability to take measures at those ports to protect domestic agricultural producers from the introduction of these damaging pests. While the false coddling moth is of great concern, such basis by USDA does not appear to consider four other major factors:

(1) Small shipments under a high degree of scrutiny to those ports is hardly representative of the scale of product or the inspection coverage that would realistically be required if restrictions of importation were removed for inbound citrus from South Africa. (2) Multiple other species of pests exist in South Africa (but not in the U.S.), yet the CIED does not address them. (3) Several of those such pests cannot be lured for surveillance by South Africa and no post-harvest treatments are available to mitigate the risk of shipping them to the U.S. (4) The history of importing citrus from South Africa in to the existing ports of Wilmington, Newark and Philadelphia cannot be used as a comparison as to what would happen at ports in Georgia, as the climates, amount of agriculture, and abundance of host materials for pests are very different between the Northeast and Southeast regions of the U.S.

In reviewing the comments and letters submitted to USDA in support of this decision, of noted interest is that the letters of support were primarily submitted by those persons/parties not in agriculture. The letters stated they supported the decision for reasons such as reduction of shipping costs, creation of jobs and quicker receipt of product to customers. While all these reasons are viable, USDA must not make decisions based on economic pluses and disregard the agricultural (and economic) negatives. Part of the USDA APHIS mission is to protect domestic producers – help the American farmer; port trade concerns in this scenario does not fully protect the American farmer. Georgia’s agricultural industry brings \$76B to the state’s economy. Should a South African pest unintentionally invade Georgia, it could be devastating. For example, Florida citrus is in the fight of its life against the Asian Citrus Psyllid (ACP), a pest which inadvertently and unknowingly entered Florida years ago. The cost to fight this pest went up over 300% in the last decade to nearly \$2000 an acre now. Think about that, 300% because of an accidental event. And once the ACP was here, the devastating consequences are here forever.

The Georgia Citrus Association urges you to reevaluate this proposal and consider the consequences for all states. The risk of the change will likely not be worth the reward.

Respectfully,

*Lindy Savelle*

Lindy Savelle, President