



CALIFORNIA FARM BUREAU FEDERATION

FEDERAL POLICY DEPARTMENT

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August 10, 2016

U.S. Department of Agriculture
Regulatory Analysis and Development, PPD, APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Docket No. APHIS-2014-0092
RIN: 0579-AE17

Dear Administrator Shea:

The California Farm Bureau Federation (CFBF) requests that the U.S. Department of Agriculture Animal and Plant Health Inspection Service withdraws the proposed rule to allow importation of fresh lemon fruit from Argentina into the United States. Until the risk of pest, disease, and economic factors associated with granting access are fully evaluated, USDA must not allow the importation of Argentine lemons. Currently, the rule fails to apply expert data on lemon supply and demand in the U.S. and undermines the impacts to farmers and the many communities that rely on packinghouse and farm jobs.

USDA has created the misconception that Argentine lemon imports will reduce prices, increase consumer demand, and that all growers will benefit. The proposed rule pays no attention to expert and USDA supported data that distinctly shows lemons are a product with an inelastic demand, therefore reductions in price will not proportionally increase consumption.

The assumption that Argentina will only export less than a million cartons of lemons to the U.S. is misconstrued as Argentina is facing increased competition and economic slowdowns in their key export markets – namely Europe, Russia and Asia. Additionally, foreign investments are supporting more lemon production in Argentina. The Argentine Government has said it stands ready to export 16.5 million cartons as the U.S. is one of the most attractive and lucrative markets in the world for Argentine lemons. Argentina has full capability to produce and export more than a million cartons of lemons. Mexico, a producer twenty times smaller than Argentina, exports two million cartons to the U.S., an example of the export capabilities of Argentine lemons to the U.S.

The U.S. citrus industry is already threatened by the pest and disease complex of the Asian Citrus Psyllid (ACP) that transmits the Huanglongbing (HLB) disease which is fatal to citrus trees. APHIS has spent millions of dollars in research and monitoring to learn how to control this pest and disease, yet is considering allowing access of Argentine lemons to the U.S. markets, with the potential to directly threaten the lemon industry. In addition to the threat of ACP and

HLB, the lemon from Argentina can harbor other diseases and insects which are not currently in the U.S., and could lead to further damage of the citrus industry.

The importation of Argentine lemons will have a negative impact on California lemon farmers and local communities. USDA should thoroughly evaluate the risks of pest, disease, and economic factors by utilizing the best available current data before granting access. CFBF opposes the rule that hastily puts politics over farms without fully considering the real impacts.

We value the opportunity to provide these comments and look forward to working with USDA as this important policy decision is finalized.

Sincerely,

A handwritten signature in cursive script, appearing to read "Chelsea Molina".

Chelsea Molina
Legislative Analyst
California Farm Bureau Federation