



WORLD TRADE ASSOCIATION
OF PHILADELPHIA, INC.

December 22, 2021

Ms. Jennifer Moffitt
Undersecretary for Marketing and Regulatory Programs
U.S. Department of Agriculture
1400 Independence Avenue, SW
Washington, DC 20250

Dear Undersecretary Moffitt:

The members of the Maritime Exchange for the Delaware River and Bay, Chilean & American Chamber of Commerce of Greater Philadelphia, and World Trade Association of Philadelphia strongly support the importation of Chilean plums into the U.S. The current USDA regulation, which requires irradiation, imposes severe limitations on the industry and has subsequently halted this line of trade.

Thank you for considering a Systems Approach and options of fumigation, including methyl bromide, for the importation of Chilean plums, as noted in the November 3 Federal Register notice, Docket No. APHIS-2021-0041. However, if the final rule is not published soon, this measure will not account for the current Chilean plum season. We therefore formally request USDA take all necessary measures to assure an expedited review and clearance so that the systems approach final rule could be effective as soon as possible after the conclusion of public comments.

The Chilean plum season runs from November through April, and this year's season is already underway. Currently, Chilean plums can only be imported into the U.S. using irradiation, a method of pest mitigation only available at a single facility located in Mississippi. If the USDA does not take immediate measures, importers, exporters, and consumers will lose the current season.

Chile provides 99% of plum exports to the U.S. market, which supplies the eastern U.S. and Canadian consumers who desire fresh fruit when there is no domestic production. Delaware River ports have the distinction of being the largest ports of entry for Chilean plums and stonefruit in the U.S., handling 60% of total Chilean plum imports to the U.S. With no plums available, stonefruit supply and demand anomalies will exacerbate the already-constrained supply chain for all players.

As you know, the ongoing partnerships strengthened through international supply chains ensure a continuous, reliable food supply for all Americans. Our nation's consumers as well as the hundreds of thousands of men and women who earn their livelihoods at our nation's seaports and throughout the supply chain also benefit from the relationships the Delaware River port community maintains with global partners like Chile.

On behalf of our collective memberships, list attached, thank you for your consideration of our request. Please feel free to contact us with any questions or if you need additional information.

Sincerely,

Lisa Humber
President
Maritime Exchange for the
Delaware River and Bay

Robert Palaima
President
Chilean & American Chamber
of Commerce

Lawrence Antonucci
President
World Trade Association
of Philadelphia, Inc.

cc: Mr. Kevin Shea, Administrator, Animal and Plant Health Inspection Service
Dr. Osama El-Lissy, Deputy Administrator, Plant Protection and Quarantine

721 Logistics, LLC
Acme Industrial
ACV Enviro
Adriatic Ship Supply
Advance Customs Brokers
Advantech Inc.
Agate Construction
Agility Logistics
Agro Merchants
AGRO Merchants Group
All Staffing Warehouse
Alpha Marine Surveyors
AM Fresh North America
AMC Direct, Inc
American Institute for International Steel
American Lifting Products
American Petroleum Institute Pennsylvania
AmSpec
Anchor Consultants
AP Construction
Aramark
ARRC Line (Atlantic Ro-Ro Carriers, Inc.)
Art Sulzer Associates
ASOEX
Associates International
Association of Bi-State Motor Carriers
Atlantic Commercial Materials
Atlantic Crane
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Atlantic Maritime Ship Supply
BATA Marine
Bay Shippers
Bayshore Recycling
BCI Miami Branch
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Best Transportation
BHA Consults, LLC
Biehl
Blank Rome
Blommer Chocolate
Buchanan, Ingersoll, Rooney
Buckeye Partners
Burlington Country Bridge Commission
BWC Terminals
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Capes Shipping
Capespan North America LLC
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Ch113 A Digital Country
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CMS Transportation, Inc.
Coast to Coast International
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Coleman's Launch
Collegiate Consortium for Workforce & Econ
Development
Commerce Construction
Community College of Philadelphia
Compliance Management International
Consumer Energy Alliance
Cory Brothers
Covert Transportation Logistics LLC
CPI Operations (formerly Axeon)
Crowley
CSI International
D2 Organization
Dann Marine
Danneman Firm
Dave Scott
DE Valley Reg'l Planning Commission
Dean Couphos
Deasey, Mahoney & Valenti, Ltd
Del Monte Fresh Produce
Delaware Bay & River Co-Op
Delaware Bay Launch
Delaware City Refining
Delaware Maritime Education
Delaware River and Bay Authority
Delaware River Harbor Pilots
Delaware River Partners
Delaware River Steamboat Floating Classroom
Delaware River Stevedores
Delaware River Waterfront Corp
Delaware Ship Supply
Delaware Valley Chapter of the Steamship
Historical Society
Dennis Dougherty
Dependable Distribution
Diamond State Port Corporation
Docking Pilots
Dole Fresh Fruit Company
Drexel University - Office of International
Programs
Dryden Diving
DSV
Duffield Associates
East Coast CES
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Eastern Lift Truck
Ecolab Specialty Pest Services
Eddystone Marine & Rail Terminal
EMR
Energy Transfer
Eric Clarke
Evans Network of Companies
Excel Hydraulics
Executive Shipping Services
Falcon Express
Four Chaplains Foundation
Fox Rothschild
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Fyffes
GAC
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Galasso Trucking
Gallagher Marine
Gawthrop Greenwood
General Maintenance & Labor
General Marine Industrial
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GEODIS USA, Inc.
GHD
Great White Fleet
Gregory Adams
Griggs
GT USA Wilmington
Gulf Harbor Shipping
H&M International Transportation
Hamburg SUD
Hays Tug
Hazzouri and Associates
HDI Marine
Holt Logistics Corp.
Honorary Consulate of Chile
Host Agency LLC
Hudson Analytix
Hueber Launch
ICI Innovations
ILA 1291
ILA 1694
Inchcape Shipping Services
Independence Seaport Museum
Independent Container
Industrial Welding and Repair
International Business Association- Temple University
International Registries, Inc.
Interport Pilots
Intertek
Int'l Assoc of Maritime and Port Executives
J & K Fresh East, div of 721 Logistics LLC
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Jac. Vandenberg, Inc.
Jacobs Engineering
James McGee
John Fuller, Esq.
John Kawczynski
John S. Connor
Kinder Morgan
KRIS 3 Solutions LLC
Kyodo
Law Office of Robert Degen
Leonards Express
Lorco
Mackay
MAFCO Worldwide
Mallard Transportation
Manfredi Cold Storage & Distribution
Marano Truck Lines and Warehouse
Marine Guard
Marine Lubricants
Mariners' Advisory Committee
Maritime Academy Charter School
Mark Frolich
Martin's Line Runners
Maryland Nautical
Matson
Mattioni Ltd
McAllister Towing
McLean Contracting Company
Mediterranean Shipping
Metropolis Passenger Logistics LLC
MidAtlantic Engineering
Mid-Atlantic Shipping
Milestone Chassis Corp.
Moffatt & Nichol
Monroe Energy
Montgomery McCracken
Moran Shipping
Moran Towing Philadelphia
Mott MacDonald
Mr. Shrinkwrap
MSJ International
MTC Logistics
NAGA (North American General Agents) Northeast
NANCO Distribution
National Cargo Bureau
National Response
Neville Peterson LLP
New Castle County Chamber of Commerce
New England Steamship
New Jersey Alliance for Action
NICOM
NJ DOT
NMCI Group
Norfolk Dredging
Northstar River Services (Steamship)

Norton Lilly
Oceanport
Office of Delaware State Auditor
Oldskillz Graphics & Aerial Photography
Oppenheimer
OSG
PA Dept of Transp/Bureau of Rail, Freight, Ports,
& Waterways
Pacific Trellis Fruit
Palmer Biezup
Paul Ives
PBF Logistics Products Terminal
Penn Terminals
Penn Warehousing
Pennsylvania Petroleum Assoc
Philadelphia Barge Company LLC
Philadelphia Beltline
Philadelphia Cargo Claim
Philadelphia International Airport
Philadelphia Israel Chamber of Commerce
Philadelphia Marriott Old City
Philadelphia Ship Repair
Philadelphia Wilm District Council
PhilaPort
Philly Shipyard, Inc.
Pilots Association for Bay & River DE
Port Contractors
Port of Wilmington Maritime Society
Port to Port
Ports of the Delaware River Marine Trade
Association
Produce Services
PSA Penn Terminals LLC
Randive
Rawle & Henderson
Reeves McEwing
Rhoads Industries
Ricci Tyrrell
Richard DeGennaro
Ring Maritime
Riverside Shipping
Ronin Security
S T Hudson
SafePlace
Sandpiper
Sbrocco International Inc.
Schnabel
Schulz Properties
Seaboard
Seafarer's International House
Seaman's Church Institute
Seamen's Center of Wilmington
Select Greater Philadelphia
SGS North America
SJ Transportation
Sloomaker Marine Equipment (SME) Inc.
South Jersey Port Contractors
South Jersey Port Corp.
South River Maritime
Southern New Jersey Development Council
Spasso
Stasinis Marine
Steer Company
Stradley Ronon
Tastyfrutti International, Inc.
Terminal Shipping - Div of John Connor
Theresa Penot
TOTE Services LLC
Trans Atlantic Agencies
TransGlobal Foods Inc.
TransPro Intermodal Trucking
Tri State Maritime
Tri-State Bulk
UGI Energy
Urban Engineers
USS Vessel Mgmt/Shipping
Vane Line Bunkering Brothers
VMS - Vodde Maritime
Walker Diving
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Water Resources Association for Delaware River
Basin
Weeks Marine
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Wyndham Historic District