



# MARITIME EXCHANGE

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July 24, 2014

Mr. Osama El-Lissy  
Deputy Administrator  
USDA, APHIS, PPQ  
Room 301E Whitten Federal Building  
14th Street and Pennsylvania Avenue  
Washington, DC 20250

Re: Cold Treatment "Pilot Program"

Dear Deputy Administrator El-Lissy:

This letter is to bring to your attention the attached article, which appeared in the July 15, 2014 edition of "The Packer". This article is only one example of numerous similar communications, and it follows the June 24 USDA/APHIS Stakeholder Registry announcement indicating the agency was to begin accepting applications for listed cold-treated commodities from certain countries at the Port of Savannah.

We believe the announcement and thus the coverage it has generated has created a widespread misconception among the shipping community. It is unclear to us why USDA/APHIS would agree to publish a notice which seems to imply there are opportunities available in the Port of Savannah which are new and unavailable elsewhere.

The pilot program described in the article is limited to the entry of fresh fruit from South America arriving in containers that have completed an in-transit cold treatment as a condition of entry. With that limitation, the entry of Chilean fruit subject to a mandatory fumigation treatment is clearly not authorized under the pilot program. However, Chile is included with the countries of Peru and Brazil in the article due to a notation in the APHIS announcement which erroneously implied that Chilean fruit is subject to cold treatment.

In the attached article, APL Vice President Eric Eng is quoted as stating that "Cold treatment is an environmentally-friendly alternative to fumigation-based pest control . . .". As you are certainly aware, in-transit cold treatment is not an alternative to fumigant-based pest control methods as proclaimed.

Cold treatment is not a broad spectrum treatment option for quarantine pests in the same manner as methyl bromide. Nor is there "increasing acceptance by the U. S. Department of Agriculture and other import authorities around the world" for this treatment as stated by Mr. Eng. On the contrary, it is used almost exclusively to control the transmission of fruit flies in agricultural commodities and cannot replace fumigation as a means of mitigation.

We further understand that any active port could be eligible to receive agricultural commodities subject to cold treatment as a condition of entry, provided the treatment is completed before the containers are discharged from the vessel. This is not unique to the Port of Savannah as implied in the USDA APHIS announcement, or any other specific port.

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If you believe any of our understandings as outlined in this letter to be incorrect, we would appreciate hearing from you in this regard.

Otherwise, we trust you will understand why we hereby respectfully request that USDA issue a press release clarifying matters and distribute it widely among the APHIS stakeholder community.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, reading "Dennis Rochford". The signature is written in a cursive style with a long, sweeping tail that extends to the right.

Dennis Rochford  
President

/Enclosure

# THE PACKER

EVERYTHING PRODUCE

## USDA tests South American fruit programs at U.S. ports

07/15/2014 01:34:00 PM  
Coral Beach

Beginning Sept. 1, citrus fruit, grapes and blueberries from South America should be arriving sooner and lasting longer on retailers' shelves in the Southeast U.S. as the Port of Savannah begins a pilot program.

The U.S. Department of Agriculture pilot program includes a chilling period of at least 17 days for the fresh fruit from South America to protect against fruit flies, according to a news release. The cold treatment will be done in the producing countries, en route on ships or at transshipment points such as Panama.

Fresh fruit from South America has traditionally been sent to Northern ports in the U.S. for cold treatment, according to Curtis Foltz, executive of the Georgia Ports Authority, who said in the release the pilot program will allow for quicker delivery to the Southeast.

That quicker delivery should mean longer shelf life and possibly better prices for retailers and consumers, Foltz said in the release.

The NOL Group's ocean shipping arm, APL (American President Lines), uses the Port of Savannah already and anticipates increased shipments of fresh fruit as the pilot program plays out.

"Cold treatment is an environmentally-friendly alternative to fumigation-based pest control methods that emit greenhouse gases into the atmosphere," APL vice president for global reefer trade Eric Eng said in the release. "Its increasing acceptance by the USDA and other import authorities around the world enhances the overall viability of shipping fresh produce by sea."



Courtesy Geo

A pilot program with the USDA will allow blueberries and citrus fruit from South America to be offloaded at the Port of Savannah beginning Sept. 1, provided the fruit undergoes cold treatment before arrival.



Courtesy Georgia Port Authority

The newest and largest ship-to-shore cranes at the Port of Savannah work the Nedlloyd Hudson, a Maersk vessel. The Georgia Port Authority's facilities now include 25 ship-to-shore cranes.

One problem some southern ports have when it comes to shipments of chilled produce is less than adequate refrigerated warehouse space. However, Savannah's port can temporarily store 2,600 refrigerated containers, according to the release.

The USDA's deputy administrator of plant protection and quarantine, Osama El-Lissy, said in the release he is working with the Georgia Port Authority and the Bureau of Customs and Border Protection to monitor the cold commodities in the Savannah port pilot program.

By shipping the fruit to Savannah for inland distribution, truck-related costs and emissions can be reduced. Citi commercial officer for the Georgia Ports Authority, said in the release that post customers have been asking for fruit closer to the retail market areas of the Southeast.

A similar pilot program, initiated by USDA in October at Port Miami and Port Everglades for grapes and blueberries from Peru and Uruguay, is already considered a success by some officials. It also greatly reduces the time and cost commodities have to spend on the road once they reach the U.S.

Abel Serrano, a customs supervisor at PortMiami, told attendees at the International Perishables Conference earlier this year that he expects the pilot program to be expanded because it has been so successful.

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