



# MARITIME EXCHANGE

for the Delaware River and Bay

*Leading the Way to Port Progress*

John T. Reynolds, Chairman  
Uwe Schulz, Vice Chairman  
Robert A. Herb, Treasurer  
Lisa B. Himber, President  
A. Robert Degen, Esq., Secretary/Solicitor

December 30, 2021

Regulatory Analysis and Development, PPD  
APHIS, Station 3A-03.8  
4700 River Road, Unit 118  
Riverdale, MD 20737-1238

Re: Docket No. APHIS-2021-0041, Notice of Proposed Revision to Requirements for the Importation of Plums from Chile into the United States

Dear Docket Clerk:

The Maritime Exchange for the Delaware River and Bay and its nearly 300 members strongly support the above-referenced Notice allowing the importation of Chilean plums under a Systems Approach and options of fumigation, including methyl bromide. However, if the final rule is not published soon, this measure will not account for the current Chilean plum season, which already began in November.

For your information, the Maritime Exchange for the Delaware River and Bay is a nonprofit trade association dedicated to promoting waterborne commerce in the tristate region. The Exchange and its members support 135,000 direct, indirect, and induced port jobs, many of which will benefit from this rulemaking.

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 publish the final rule swiftly, importers, exporters, and consumers will lose the current season. We therefore request USDA take all necessary measures to assure an expedited review and clearance so that the Chilean plum trade can resume as soon as possible.

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. Thus, bringing this matter to a speedy resolution is essential.

Thank you for your consideration of this information and our request. Please feel free to contact me at 267-974-0488 or [lisa.himber@maritimedelriv.com](mailto:lisa.himber@maritimedelriv.com) should you have any questions or require additional information.

Sincerely,

Lisa B. Himber  
President