



# MARITIME EXCHANGE

for the Delaware River and Bay

*Leading the Way to Port Progress*

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February 22, 2022

Mr. Kevin Shea, Administrator  
Dr. Mark Davidson, Associate Administrator/Acting Deputy Administrator  
Plant Protection & Quarantine  
Animal Plant Health Inspection Service  
U.S. Department of Agriculture  
1400 Independence Avenue, SW  
Washington, DC 20520

Dear Administrator Shea & Dr. Davidson:

The Maritime Exchange for the Delaware River and Bay respectfully requests that APHIS prioritize the regulatory process and publish the notice for public comments to permit the importation of avocados from Brazil into the continental United States. The USDA's recent temporary suspension of avocado imports from Michoacán, Mexico on top of already skyrocketing avocado prices, shows how few options American have for enjoying the increasingly popular fruit. And it dramatically underscores the need to offer U.S. importers a choice of multiple sources for imported products.

For your information, the Maritime Exchange is a nonprofit trade association dedicated to promoting and protecting waterborne commerce in Delaware, Pennsylvania, and New Jersey. The Exchange's 300 members support 135,000 direct, indirect, and induced port jobs, many of which will directly benefit directly from the opening of the U.S. market for avocados from Brazil.

In 2021, Mexico shipped over 2.3 billion pounds of avocados to the U.S. via terrestrial ports of entry along the southern border. This will undoubtedly increase in 2022 after APHIS recently announced that the State of Jalisco will be allowed to export avocados to the U.S. starting in April. Unfortunately, this rulemaking will not benefit the Delaware River maritime community, which has developed an expertise in safely and efficiently handling imported perishable commodities. Conversely, avocados from Brazil would all be shipped via maritime ports of entry.

APHIS and its Brazilian counterpart, the Ministry of Agriculture, Livestock & Food Safety, are to be commended for completing the necessary investigations, documents, and site inspection visit to Brazilian avocado orchards and packing houses to allow for the safe importation of avocados from Brazil via a systems approach.

Given these considerations, we trust your agency will prioritize this regulatory process and publish the notice and request for comments, which we will robustly support in alignment with our port membership.

Thank you for this opportunity to express our views. 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

cc: Ms. Patricia Abad, Senior Assistant Trade Director for the Western Hemisphere, Plant Protection & Quarantine - Phytosanitary Issues Management  
Ms. Andrea Simao, Assistant Deputy Administrator, Plant Protection & Quarantine - Phytosanitary Issues Management  
Ms. Barbara Spanger, Trade Director, U.S. Department of Agriculture