



MARITIME EXCHANGE

for the Delaware River and Bay

Leading the Way to Port Progress

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

Re: Docket No. APHIS-2021-0078

Dear Sir or Madam:

Thank you for providing the pest risk assessment and commodity import evaluation relative to the importation into the U.S. of fresh table grapes from certain regions of Chile. The Maritime Exchange for the Delaware River and Bay is a nonprofit association representing the Delaware River port industry—a significant importing location for Chilean table grapes.

The Maritime Exchange supports measures that will facilitate the movement of grapes from Chile into the United States. We equally support all reasonable efforts to minimize the use of methyl bromide.

However, we offer the following considerations:

- As always, USDA must be sure the science behind any assessment and evaluation is sound.
- Methyl Bromide as a commodity fumigant is the only USDA approved fumigant for European Grape Vine Mites.
- USDA must move carefully, as the success rate of the systems approach in these regions is unknown. USDA should plan to allow for the use of methyl bromide in the event the systems approach is unsuccessful, as has been the case in the past.

We must also note that table grape fumigations represent a substantial part of the applicators' business. If this business disappears, it is possible the applicators will be unable to maintain their operations, thus jeopardizing the availability of methyl bromide for other commodities or when it is needed to mitigate any pest infestation that escapes the systems approach. Simply stated, if we lose fumigation capacity, it may not be possible to get it back.

The Maritime Exchange commends USDA for its methodical approach to implementing new programs and thanks you for the opportunity to express our views.

Sincerely,

Lisa B. Himber
President