



OFFICE OF COUNTY MANAGER
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MIAMI, FLORIDA 33128-1994
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July 23, 2004

Docket No. 03-022-3
Regulatory Analysis and Development
PPD, APHIS, Station 3C71
4700 River Road, Unit 118
Riverdale, Maryland 20737-1238

Dear Sir:

Miami-Dade County is concerned about the Department of Agriculture's Animal and Plant Inspection Service's proposed amendments to allow the importation of Hass avocados into all 50 states, including Florida.

Miami Dade County farmers have expressed concern that there may be a risk of infestation by pests which include the Mediterranean fruit fly and the avocado seed weevil, and Florida Department of Agriculture and Consumer Services Commissioner Charles Bronson has requested that no Hass avocados be allowed to enter Florida until such time that the Florida Department of Agriculture and Consumer Services, Division of Plant Industry (FDACS/DPI) has been provided with one year's monitoring data demonstrating the shipments are free of plant pests of quarantine significance. The FDACS/DPI has also requested proof that Hass avocados are resistant to all fruit flies as well as further information on Mediterranean fruit fly trapping programs in the Hass avocado production areas of Mexico.

Miami-Dade County supports Commissioner Bronson's recommendations and believes they are prudent considering the \$62 billion dollar impact agriculture has on the Florida economy. Your consideration of this matter is of the utmost importance due to the catastrophic damage a pest infestation could have here in Miami-Dade County, in the State of Florida, and across the United States.

Sincerely,

A handwritten signature in black ink, appearing to read 'Alex Muñoz'.

Alex Muñoz
Assistant County Manager

Cc: Cathy Grimes-Peel, Director, Consumer Services Department



Florida Department of Agriculture & Consumer Services
CHARLES H. BRONSON, Commissioner

Please Respond to:
Division of Plant Industry
P.O. Box 147100/1911 Southwest 34th Street
Gainesville, Florida 32614-7100
Telephone: (352) 372-3505/Facsimile: (352) 955-2300

June 8, 2004

Docket No. 03-022-3
Regulatory Analysis and Development
PPD, APHIS, Station 3C71,
4700 River Road Unit 118
Riverdale, Maryland 20737-1238

Dear Sir:

Please accept this as the written comments from the Florida Department of Agriculture and Consumer Services, Division of Plant Industry (FDACS/DPI), in response to the U.S. Department of Agriculture's Animal and Plant Inspection Service proposed amendments to allow the importation of Hass avocados into all 50 states.

The FDACS/DPI strongly opposes any provisions that would allow Hass avocados to enter Florida until such time that we are provided with at least one year's monitoring data, both within Mexico and shipments to other states, which demonstrates the shipments are free of plant pests of quarantine significance.

The FDACS/DPI is also requesting that scientific data be provided which proves the Hass variety of avocados (under all environmental conditions) is resistant to all fruit flies known to be established in Mexico. There is concern that certain environmental conditions may cause the avocado to ripen prematurely while still on the tree and therefore making it susceptible to fruit flies. We would also like to receive information regarding the Mediterranean fruit fly trapping program that is being utilized in the Hass avocado production areas of Mexico.

Based on the concerns stated above, the FDACS/DPI encourages the USDA to delay the entry of Hass avocados into Florida for at least one year and to provide a quarterly monitoring report indicating all plant pests (including fruit flies) detected during surveys in Mexico as well as post entry inspection activities within other states approved to receive these avocados.

Sincerely,

CHARLES H. BRONSON
COMMISSIONER OF AGRICULTURE

Richard Gaskalla
Director, Division of Plant Industry

RDG/dcp