

DIVISION OF PLANT INDUSTRY
(352) 372-3505



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POST OFFICE BOX 147100
GAINESVILLE, FLORIDA 32614-7100

1911 S.W. 34TH STREET
GAINESVILLE, FLORIDA 32608

FLORIDA DEPARTMENT OF AGRICULTURE AND CONSUMER SERVICES
COMMISSIONER ADAM H. PUTNAM

November 16, 2011

Docket No. APHIS-2009-0100
Regulatory Analysis and Development
Policy and Program Development
Animal and Plant Health Inspection Services
Station 3A-03.8
4700 River Road Unit 118
Riverdale, Maryland 20737-1238

Re: Docket No. APHIS 2009-0100; proposal to amend the phytosanitary treatment regulations to provide generic criteria for new irradiation treatment facilities in the Southern United States.

To Whom It May Concern:

As this proposed change represents a major change in traditional and accepted phytosanitary treatment standards and protocol, the Florida Department of Agriculture and Consumer Services' Division of Plant Industry (FDACS'DPI) has reviewed Federal Register Docket No. APHIS-2009-0100, "Irradiation Treatment; Location of Facilities in the Southern United States" with great interest.

The Florida Department of Agriculture and Consumer Services' Division of Plant Industry strongly opposes this proposed regulation. Florida's climate, multiple ports of entry, and crop diversity make us a high risk area for fruit fly and other invasive exotic pests of economic importance that may be imported with regulated articles. This is clearly evidenced by the multiple *Ceratitidis capitata*, and *Bactrocera* sp. fruit fly eradication programs that have occurred over the past several years and cost over five million dollars to eradicate. Untreated imported perishable commodities that are hosts of fruit flies or other plant pests could easily escape prior to treatment or by-pass quarantine treatments. We do support additional protection for Florida's environment through inspections and required quarantine treatments in origin countries with additional inspection at the port of entry to confirm the treatments were applied properly.

We appreciate the opportunity to comment on this ill advised proposed rule. If we may be of further assistance on this issue feel free to contact my office.

Sincerely,

ADAM H. PUTNAM
COMMISSIONER OF AGRICULTURE

Richard Gaskalla
Division Director

RDG/dh

Monday, November 28, 2011

Docket No. APHIS-2009-0100
Regulatory Analysis and Development, PPD
APHIS, Station 3A-03.8
4700 River Road Unit 118
Riverdale, MD 20737-1238

Subject: No New Irradiation Facilities -- Irradiation Treatment; Location of Facilities in the Southern United States (Document ID APHIS-2009-0100-0001)

Dear Secretary Vilsack,

I urge you to reject the proposed amendment to phytosanitary treatment regulations that would allow the construction of new irradiation facilities anywhere in fifteen southern states (Docket # APHIS-2009-0100.) These facilities are intended to be used on imported fruits and vegetables in order to kill pests such as fruit flies that would otherwise prevent these products from entering the United States.

"It is horrifying that we have to fight our own government to save the environment."
-- Ansel Adams

Right now, the U.S. Department of Agriculture's policy is to allow irradiation facilities for imported fruits and vegetables to be built in specific locations in Mississippi, North Carolina, and Georgia. I oppose this current approval for the construction of irradiation facilities, and absolutely oppose any attempt to expand the list of locations where irradiation facilities for imported food can be constructed.

In addition to my concerns about the safety of irradiated food—which can deplete vitamins and create new chemical byproducts in treated foods—I also believe it is inappropriate for U.S. Department of Agriculture (USDA) to facilitate more produce imports into the United States. The purpose of these facilities is to help exporting countries deal with pest infestations that currently serve as a barrier to sending their produce to the United States.

The USDA should not put U.S. farmers at a disadvantage by encouraging more imports of fruits and vegetables from countries with pest problems, or by putting domestic producers at risk if the irradiation treatment is ineffective or pests escape. And the USDA should not be encouraging more imports from countries with weak labor, environmental, and other standards that can undercut U.S. farmers.

"Do not suffer your good nature, when application is made, to say 'Yes' when you should say 'No'. Remember, it is a public not a private cause that is to be injured or benefited by your choice."
-- George Washington

Expanding the use of irradiation is an inappropriate way to deal with the risk of pests carried by imported food. The USDA should not put consumers, U.S. farmers, and communities in these fifteen states at risk by expanding the use of irradiation.

Thank you for your consideration of my comments. Please do NOT add my name to your mailing list. I will learn about future developments on this issue from other sources.

Sincerely,
Christopher Lish
Olema, CA