

LUCCA

Freezer & Cold Storage, Inc.

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Date: 3/06/13

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

Re: Docket No. APHIS-2011-0060
Proposed Rule: Importation of Fresh Citrus from Uruguay

Dear Sir/Madam:

We are writing in full support of the Animal Plant Health Inspection Service Docket No. APHIS-2011-0060, that allows for the importation into the Continental United States fresh citrus from Uruguay under certain conditions. We anticipate that all risk mitigation procedures will be vigorously implemented by the growers and packing house operations in Uruguay, and the U.S. consumers will benefit from the additional source of high quality citrus.

Lucca Freezer & Cold Storage has been in the produce business for over 30 years. We are one of the largest packers of imported citrus on the east coast. If Uruguay fresh citrus is granted entry into the US it will help to create numerous jobs throughout the supply chain.

Our interest in the USA summer citrus market is consumer driven. The consumption of citrus during the summer months has expanded over the past decade from 20,000 metric tons to 200,000 tons, based on a high percentage of consumers who want fresh citrus 12 months of the year. These consumers are heavy users who purchase citrus for taste and wellness attributes. There is limited domestic citrus production during the summer months and no production of Mandarins. During this period, Uruguay produces the citrus varieties preferred in the U.S. market and this supply will complement the other sources within the Southern Hemisphere.

We commend APHIS for this decision and we urge the USDA to adopt and to implement this rule.

Respectfully submitted,

Russell Lucca
President