

Comment from Hawaii Avocado Association  
Thomas Benton President  
Subject: Docket No. APHIS-2012-0008  
Interstate Movement of Sharwil Avocados From Hawaii

1. Hawaii's current limited production will ensure a slow controlled introduction to the mainland market. Our production is now being consumed by our own closed market. This will give us and APHIS the ability to cautiously observe the process as our production increases and markets are developed on the mainland.

2. Concerning the previous protocol problem, the larvae infested fruit that was discovered in 1991 in a packing facility was discovered by a worker in a fruit he culled and showed to the inspector on duty. There never was an infested fruit found in a box ready for shipment. In all the shipments sent to the mainland, every shipment was tested on arrival with at least one case purportedly incubated and no fruitfly ever discovered. The system was working. The system was shut down because the protocol was based on the premise that Sharwil avocado was not a host to fruitfly. So when the larvae was found in the culled fruit, the protocol was invalidated on that ground. We would like to note that in the most extensive research to date (Armstrong research that went on for at least the previous five years to 1991), there were no fruitfly infestations discovered and none since that year in fruit on the tree. And please note that during the problem year we shipped successfully with no fruitfly found in any shipment. Plus now we have further strong mitigations in the proposed protocol. The protocol proposed now is based on poor host status and mitigates the risk through a sequence of strong mitigations, each one of which factors the risk down to the point that the chance of an Oriental Fruitfly colony getting established in a fruit growing area on the mainland is mathematically infinitesimal and practically speaking Zero. Factoring that with the enhanced ability to eliminate an infestation, the benefit to the Hawaii Farmer, the American consumer, and Economy far outweigh the risk.

3. I would like to personally state that I've shipped millions of lbs of Sharwil Avocado intrastate over the last 30 years and never had one complaint, credit or return from a customer because of a fruitfly infestation. In our business we would have heard about it. Consumers return infested fruit to the store, the store wants a credit from the wholesaler and they let us know. I've marketed other kinds of fruit and this is not uncommon.

4. We expect there to be comment to the effect that there should be zero fruitfly in the traps to ship out of an orchard. That is unrealistic for the small farmer and unnecessary. The multiple and sequential strong mitigations are more than adequate.

5. Sharwil Avocados are well suited to Hawaii and sustainable with limited resources. Their harvest period fits nicely into the time when the mainland production slows and with the proposed window for shipping in the protocol. Our previous experience showed us that the Hawaii Sharwil will be very competitive --and if the price is even close, dominate. Also over time we believe there will be a benefit to the American Shipping economy as Hawaii Sharwils begin to fill some of the empty containers returning to the mainland.

6. The Hawaii Avocados Association believes the proposed protocol is understandably very cautious but doable for the Hawaii farmer. We appreciate the thorough work APHIS has done on this. We obviously do not want a system that might fail. It has taken us 22 years to get back to where we are now and for the most part it will be a new generation of farmers and agricultural businessmen who will benefit from this. We believe this system is very safe and will enable the Hawaii farmer to build a good dependable market for the Hawaii Sharwil and to be able to expand our production for the benefit of everyone concerned.

Respectfully,  
Thomas Benton  
President of Hawaii Avocado Association