



VANE LINE BUNKERING, INC.

7/19/2016

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

RE: Docket No. APHIS-2014-0092
Proposed Rule/Extension of Comment Period:
Importation of Lemons from Northwest Argentina

Dear Sir/Madam:

We write in support of the APHIS Proposed Rule to allow importation of fresh lemon fruit from Northwest Argentina into the U.S.

Vane Line Bunkering is a U.S. flag Tug/Barge Company with 129 vessels operating from the east coast of Canada to Texas and throughout the Caribbean. We are leading provider of marine transportation of petroleum products, with a base of operations located in Philadelphia, Pennsylvania. As one of our core services, we provide bunkering and fueling services to all deep draft vessels calling on the Port of Philadelphia.

There are several reasons to view importation of lemons from Northwest Argentina as a positive development worthy of consideration.

- Lemon consumption in the U.S. has outpaced production. The U.S. has turned to imports to supplement its domestic supply and in 2015, imported 83,000 metric tons of lemons, mainly from Mexico and Chile. Passage of this proposed rule would allow Argentina a place on the international roster to compete for this seasonal product during the April to August window when production of U.S. lemons is at its lowest point.
- As the largest U.S. port complex for bulk fruit imports, lemons from Argentina would be an ideal cargo addition for the Delaware River tristate transportation sector. Increased activity for Delaware River ports equals jobs.
- Consumers reap the benefit of extended availability of a high quality product during a period of limited domestic supply.

It is our understanding that this proposed rule results from more than 10 years of technical negotiations between the U.S. and Argentina and is based on credible scientific support and a thorough Pest Risk Assessment (PRA) and a systems approach consisting of rigorous safeguards to prevent the introduction of any plant pest or disease into the U.S. Further, Argentina has a country-wide traceability system in place required for all lemons headed to the export market. This system traces the fruit from its orchard of origin to its final destination, validates its production history, and includes an inspection summary. With these procedures in place and executed properly, we anticipate no risk to the U.S. citrus industry.



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Extensive experience with imported citrus at Delaware River ports allows us a level of confidence that the phytosanitary protocol proposed by APHIS for the importation of Argentinean lemons into the continental U.S. provides domestic producers with sufficient protection.

Thank you for your consideration of this request. Please contact me at (your email address) or at (your phone number) with questions.

Sincerely,



Captain Rick Iuliucci
General Manager
The Vane Brothers Company
4925 Ft. Mifflin Road
Philadelphia, PA 19153



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