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August 29, 2016

Mr. Kevin Shea, Administrator
USDA Animal Plant Health Inspection Service
1400 Independence Ave., S.W.
Washington, D.C. 20250

RE: Proposed Rule APHIS 2013-0081- Standardizing Phytosanitary Treatment Regulations; Approval of Cold Treatment and Irradiation Facilities; Cold Treatment Schedules; Establishment of Fumigation and Cold Treatment Compliance Agreements.

Dear Mr. Shea:

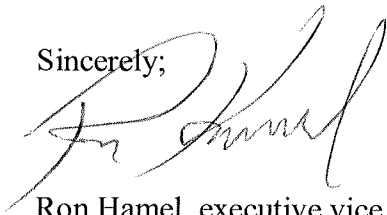
On behalf of Southwest Florida's citrus industry, the Gulf Citrus Growers Association, representing over 25% of the state's production, strongly opposes the proposed rule (APHIS 2013-0081) regarding point of destination cold treatment facilities. Our production region is Florida's southern-most geographically located citrus growing area, and during the past two decades has been severely impacted by the Citrus Canker and Citrus "Greening/HLB" diseases. University of Florida, Institute of Food and Agricultural Sciences (IFAS) scientists have indicated that our close proximity to the Port of Miami makes our region most vulnerable to pests and diseases entering our state!

Our association finds it extremely unconscionable that USDA's Animal Plant Health Inspection Service would advance a proposed rule that would put Florida's and other southern state's specialty crop producers at risk from the importation of pests and diseases. We respectfully request that agency administrative leadership deeply review and study the considerable economic impacts that imported pests and diseases have caused. Between Citrus Canker and Citrus "Greening/HLB" the financial impact to Florida's citrus industry have been over \$5-billion! And, as you are well-aware, the costs of research and eradication efforts by the USDA, Florida Department of Agriculture and Consumer Services, AND citrus growers, packers and processors to deal with IMPORTED pests and diseases continues to "grow" exponentially.

Although not perfect, as evidenced by the recent find of Mediterranean fruit fly larvae in clementine oranges from Morocco at the Port of Philadelphia, current systems approaches and phytosanitary practices have been relatively effective at preventing costly exotic fruit fly programs for U.S. agriculture. Any cold treatment should occur at the point of origin or in route to the United States. We support the fact that any cold treatment should be completed prior to the arrival of the respective produce into Florida ports.

We respectfully request that APHIS maintain its current systems in order to protect our state's valuable specialty crops and the communities that support. Thank you in advance for your consideration of our concerns.

Sincerely;

A handwritten signature in black ink, appearing to read "Ron Hamel", written in a cursive style.

Ron Hamel, executive vice president
Gulf Citrus Growers Association

cc: Board of Directors