

EXECUTIVE SUMMARY

The California Avocado Commission (CAC) urgently warns that the integrity of the United States' avocado supply, and the future of California's \$1.5 billion avocado industry, is under immediate threat. This danger stems from a 2024 decision by the Biden administration to withdraw USDA inspectors from avocado orchards in Mexico following a series of violent threats and attacks from drug cartels. This decision marked the first time in nearly three decades that the U.S. has ceded oversight of phytosanitary inspections to foreign authorities in a critical import program.

Since this withdrawal, detections of dangerous pests, specifically Macrocopturus aguacatae and Conotrachelus perseae (avocado seed weevils), have surged at Mexican packing facilities. These pests pose a catastrophic risk to California's pest-free orchards. Once established, they are virtually impossible to eradicate, forcing growers into costly and environmentally regressive pesticide use, threatening international trade access, and rendering fruit unmarketable.

"Combined feeding damage by weevil or moth larvae... makes fruit unmarketable and inedible."

— Dr. Mark Hoddle,

Director of the Center for Invasive Species Research at UC Riverside

This report outlines the background of the U.S.-Mexico avocado inspection partnership, the sequence of events that led to its collapse, the biological and economic threats posed by current pest detections, and the catastrophic consequences of inaction. Most importantly, it delivers clear and actionable recommendations:

- Reinstate the original USDA inspection protocol as established in 1997
- Provide diplomatic and physical security support to reestablish U.S. inspector presence
- Hold Mexico accountable for maintaining U.S. phytosanitary standards

California's ~3,000 avocado growers cannot afford further delay. President Trump and Secretary Rollins must act now to reverse a dangerous precedent that places U.S. agriculture at the mercy of foreign threats. A failure to do so may not only devastate a signature California crop, but also signal weakness to adversaries across every U.S. agricultural sector.

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BACKGROUND

THE U.S.-MEXICO AVOCADO INSPECTION AGREEMENT (1997-2024)

In 1997, the United States Department of Agriculture (USDA), in coordination with the California Avocado Commission, negotiated a landmark agreement with the government of Mexico to allow the importation of fresh Hass avocados into the United States. The agreement lifted a ban on Mexican avocados that had been in place since 1914 to prevent a range of weevils, scabs and pests from entering United States orchards. The focus of the agreement was to protect American agriculture from the pest risks endemic to Mexico and other avocado-producing countries.

A TWO-TIERED DEFENSE SYSTEM

Under this bilateral agreement, known as the **Operational Work Plan (OWP)**, avocados intended for export from Mexico to the U.S. were subject to two mandatory USDA inspections:

1.

First, USDA's Animal and Plant Health Inspection Service (APHIS) personnel were required to inspect avocado orchards in Mexico prior to harvest.

2

Second, the harvested fruit was re-inspected at **Mexican packinghouses** before being cleared for shipment to the U.S.

Importantly, 100% of the costs associated with these inspections were paid by the Mexican avocado industry, ensuring U.S. taxpayers bore no financial burden for enforcing phytosanitary standards abroad.

"All expenses related to the inspections are paid by the Mexican avocado industry." — CAC Situation Brief, April 11, 2025

This system worked. For nearly three decades—under Presidents Clinton, Bush, Obama, and Trump—the agreement functioned with exceptional effectiveness, keeping invasive pests like seed weevils and fruit-boring moths out of California, and maintaining the state's pristine pest-free certification. During this period, California's avocado industry flourished. With no need for chemical interventions against these exotic pests, growers benefited from lower production costs, clean environmental compliance, and the ability to export to countries with strict phytosanitary barriers.

A STRATEGIC PARTNERSHIP WITH PROVEN RESULTS

California's avocado industry is fundamentally different from many of its global competitors. According to research from Dr. Mark Hoddle, entomologist at UC Riverside, California's pest-free advantage allows growers to produce high-quality, pesticide-residue-free avocados, saving millions annually and preserving market access around the world.

"The absence of avocado seed feeding pests like weevils and moths in California... allows the production of fruit that is relatively free from insecticide residues... and enables relatively easy export of fruit."

— Dr. Mark Hoddle, UC Riverside

This success is not coincidental, it is the result of a vigilant, science-based pre-export inspection process. The USDA's physical presence in Mexican orchards was the first and most effective line of defense. But that defense would be fatally undermined in late 2024.



COLLAPSE OF SAFEGUARDS

BIDEN ADMINISTRATION'S 2024 POLICY SHIFT

The nearly three-decade success of the U.S.-Mexico avocado inspection regime was abruptly upended in mid-to-late 2024, when the Biden administration—through USDA's Animal and Plant Health Inspection Service—withdrew all USDA inspectors from Mexican avocado orchards. This decision, made without consultation with the California Avocado Commission, broke a longstanding bipartisan tradition of active U.S. phytosanitary enforcement abroad and exposed the U.S. avocado industry to unprecedented risk.

CARTEL THREATS AND UNILATERAL POLICY CHANGE

The justification for the inspector withdrawal was the rising threat of cartel violence in Michoacán, the Mexican state responsible for the majority of avocado exports to the United States. APHIS claimed that the safety of its inspectors could no longer be guaranteed and thus terminated on-site inspections, **not only in orchards but, over time, also scaled back activity in packinghouses.**

This was done without public announcement, without congressional notification, and without input from American avocado growers. The Commission first learned of the decision through foreign media reports.



"We regret that California avocado growers learned through foreign media outlets about the decision to redistribute and relocate some inspectors..."

- Michael Watson, Administrator, APHIS, March 13, 2025

According to a July 2024 letter from Mexican regulators to USDA Deputy Administrator Dr. Mark Davidson, APHIS had already informed their counterparts that U.S. inspectors "will no longer accompany personnel of this General Directorate in the sampling and certification activities of all avocado orchards proposed in the Operational Work Plan."

A PATTERN OF POLICY EROSION

Subsequent APHIS communications confirmed that the agency had reinterpreted its mandate to shift responsibilities to the Mexican government. As stated by Administrator Watson:

Even inspections at packinghouses, previously the last safeguard, were **reduced** to a level that failed to detect the sharp rise in pest presence. The USDA admitted this themselves:

"APHIS and SENASICA (Mexican government) have mutually agreed in writing that APHIS will no longer routinely visit every orchard in the program."

— Michael Watson, December 20, 2024

"The number of recent interceptions is notable given the infrequency of such interceptions over the history of the program."

— Michael Watson, November 22, 2024

A BREACH OF TRUST AND A DANGEROUS PRECEDENT

This shift in enforcement represents not just a change in operational protocol, it is a **breach of the agreement** that underpinned U.S. avocado imports since 1997. The consequences are real: **Mexican inspections alone** cannot be trusted to meet the phytosanitary standards the U.S. has long required. As a result, fruit carrying dangerous pests is now being certified and shipped with reduced oversight, increasing the probability of pest introduction into California's avocado-growing regions.

Commission leadership was explicit in its warning:

"The prior administration allowed [California growers] to be victimized by Mexican cartels rather than directing Mexico to correct the security problem or forego importing avocados into the United States."

— CAC Letter to USDA Secretary Rollins, March 2025

In prioritizing bureaucratic caution over agricultural protection, the Biden administration's decision dismantled the most effective pest-prevention tool available, **boots-on-the-ground inspection.** In doing so, it placed thousands of California jobs, billions in economic value, and global market access at risk.

THE ESCALATING PEST THREAT

WHAT THE DATA SHOWS

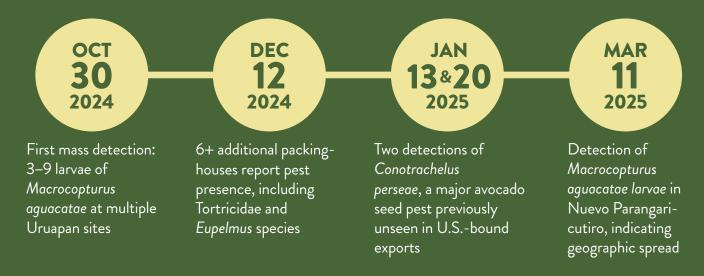
The removal of USDA inspectors from Mexican avocado orchards has had a swift and measurable consequence: a dramatic surge in detections of dangerous avocado seed pests. These include Macrocopturus aguacatae (formerly Copturus aguacatae), Conotrachelus perseae, and moth species from the Depressariidae, Tortricidae and Blastobasidae families—pests that have long posed a catastrophic risk to U.S. avocado production but were successfully excluded through rigorous inspections.

A TIMELINE OF ALARM: PEST DETECTIONS SKYROCKET

According to USDA data, from January 1 to October 17, 2024, there were no pest interceptions in Mexican packinghouses. However, beginning in late October 2024, shortly after USDA inspectors were withdrawn from grove inspections, a wave of confirmed pest detections began in packing facilities, more than 150 distinct interceptions were recorded between October 30, 2024, and March 11, 2025.

These detections occurred across multiple regions in Michoacán—Uruapan, Apatzingán, Tacámbaro, Peribán, Morelia, Tancítaro, and Turicato—signaling a systemic breakdown in pest control.

Key pest detection data points (all post-withdrawal):



These numbers are not minor statistical anomalies. As noted by USDA Administrator Michael Watson:

"The number of recent interceptions is notable given the infrequency of such interceptions over the history of the program." — Michael Watson, November 22, 2024

UNDERSTANDING THE PESTS: CONCEALED, COSTLY, AND CATASTROPHIC

The pests now being detected are not superficial threats, they are **deep-tissue fruit feeders** that are exceptionally difficult to identify, control, or eradicate once introduced into a growing region.

According to Dr. Mark Hoddle:

- Avocado seed weevils and moths lay eggs on or inside the fruit, and their larvae bore deep through the pulp to reach the seed.
- The damage they cause is internal and nearly invisible until the fruit is sliced open, rendering standard post-harvest detection ineffective.
- Once established, these pests can decimate fruit quality, increase pesticide reliance, and trigger international quarantine restrictions.



"Because these feeding life stages are so deep inside the fruit, it is almost impossible to control them with insecticides... Combined feeding damage... makes fruit unmarketable and inedible."

— Dr. Mark Hoddle, April 29, 2025





SYSTEMIC FAILURE: A POLICY THAT ENABLES PEST MIGRATION

These pests have **never established in California**, thanks to nearly 30 years of strict pre-export USDA enforcement. But the **detection spike in Mexico following USDA inspector withdrawal confirms** what growers have long feared: **Mexican self-inspection is failing**, and pest-contaminated fruit is increasingly slipping through.

The data tells a story of what happens when enforcement disappears. It's not a hypothetical risk, it's a current, escalating threat. Every box of uninspected Mexican fruit now carries with it a measurable



RISK TO CALIFORNIA

WHAT HAPPENS IF THESE PESTS GET IN

California is one of the last remaining major avocado-producing regions in the world that remains free of avocado seed weevils and fruit-feeding moths. This rare pest-free status has allowed the industry to thrive with minimal chemical intervention, high export viability, and strong consumer confidence. If pests like Macrocopturus aguacatae, Conotrachelus perseae, Heilipus lauri, or Stenoma catenifer gain a foothold in California orchards, the result would be devastating—biologically, economically, and environmentally.

ECONOMIC CONSEQUENCES: BILLIONS AT RISK

California's avocado industry is a \$1.5 billion economic engine, supporting more than 3,000 family-owned farms across 50,000 acres. Most growers operate on thin margins, and the introduction of seed-feeding pests would:

Slash fruit marketability due to internal feeding damage

Increase labor and pesticide costs, with no guarantee of efficacy

Trigger export restrictions from countries with strict phytosanitary requirements

Collapse organic and low-input production systems

Accelerate farm closures, particularly among smaller, multi-generational growers

As Dr. Hoddle warned:

"Should one or more of these pests establish in California... production costs would escalate markedly, export markets would be closed... [and it] could move the industry into unprofitability leading to the demise of an iconic and world-renowned industry."

ENVIRONMENTAL IMPACTS: FROM CLEAN-GROWN TO CHEMICAL-DEPENDENT

Currently, California avocados are grown with relatively few chemical inputs. Pest introduction would force growers to deploy aggressive pesticide regimes, undermining years of sustainability gains:

- Increased pesticide usage to combat internal feeders that are almost immune to surface treatments
- Loss of insecticide-residue-free marketing advantages
- Compromised water and soil quality due to increased chemical runoff
- Pressure on pollinators and non-target beneficial insects



This is not just a farm-level issue, it's a consumer and environmental issue.

MARKET TRUST AND BRAND DAMAGE

California-grown avocados enjoy strong brand equity for being local, fresh, and responsibly produced. Pests that render fruit unmarketable on the inside, while looking normal on the outside, pose a **direct threat to consumer trust** and retail confidence:

- Retailers may face increased returns and quality claims
- Consumers may associate California avocados with "bad fruit," even if infestation originates from imported sources
- The brand damage would affect not just domestic sales, but global market access



THE DOMINO EFFECT

California's pest-free status doesn't only protect its own growers. Other U.S. states with smaller but growing avocado industries—**Texas, Florida, Hawaii**—would be next in line if an infestation establishes a base in California. A single incursion could reshape the entire **U.S. avocado landscape**, pushing domestic production into decline and increasing reliance on imports under uncertain phytosanitary conditions.



POLICY RECOMMENDATIONS

PREVENTING AN AGRICULTURAL DISASTER

With increasing detections of seed and stem weevils in Mexican orchards and packinghouses, and growing concern among California's 3,000 avocado growers, urgent policy action is needed to restore the integrity of the U.S.–Mexico avocado trade and prevent irreversible harm to domestic agriculture.

The solution is not complex, but it does require leadership, coordination, and a return to proven safeguards.



IMMEDIATE REINSTATEMENT OF THE 1997 OPERATIONAL WORK PLAN

- Restore full USDA APHIS oversight of orchard and packinghouse inspections in Mexico.
- Resume the long-standing practice of **USDA** inspectors in the groves, as originally required under the 1997 U.S.-Mexico agreement.
- Reinforce that this is a non-negotiable condition of market access to the United States.

"The Commission is... requesting reinstatement of the OWP agreed to in 1997 and supported by every President since, except one..."
— CAC Letter to USDA Secretary Rollins, March 2025



DEPLOY TARGETED SECURITY SUPPORT FOR USDA PERSONNEL

- Collaborate with the U.S. Department of State, Mexican authorities, and law enforcement to **provide protection for USDA inspectors.**
- Consider stationing inspectors in secure convoys, rotating staff in high-risk regions, or establishing temporary secure inspection zones.
- Make clear that if Mexico cannot ensure safety for U.S. personnel, it forfeits the privilege of exporting avocados to the United States.

[&]quot;If the agreed upon inspection requirements cannot be maintained due to safety concerns...

— CAC USDA Situation Brief



DIRECT ENGAGEMENT BY THE WHITE HOUSE AND USDA LEADERSHIP

- Request that **President Trump and Secretary Rollins publicly commit** to restoring USDA inspections as a national agricultural security priority.
- Position this effort as part of a broader "America First" agricultural agenda, ensuring foreign trade does not compromise U.S. food systems.
- Task APHIS with submitting a **public plan and timeline** for full operational reinstatement in coordination with CAC.

Suggested Language for Policymakers:

"America cannot allow criminal cartels to dictate the terms of our food safety."



SUSPEND MEXICAN IMPORTS IF CONDITIONS ARE NOT MET

- Make it clear: if USDA cannot inspect every orchard and packinghouse, then avocados from those sites should **not be eligible for export** to the United States.
- Leverage this standard not as retaliation, but as **enforcement of an existing agreement** that Mexico voluntarily entered into and financially supports.

Economic Leverage:

Mexico supplies 85–90% of U.S. avocado demand. The U.S. has leverage, if wielded responsibly, to incentivize compliance.

Eighty percent of Mexico's avocado exports come to the United States.



LAUNCH A NATIONAL AWARENESS CAMPAIGN

- Work with the Commission to brief policymakers, the media, and trade stakeholders on the **true** scope of the risk.
- Dispel the myth that Mexico can self-regulate phytosanitary threats.
- Frame the issue as both a security concern and an economic defense of U.S. agriculture.

SUMMARY OF ACTION STEPS:

Recommendation	Key Action	Responsible Entity
Reinstate OWP inspections	Resume USDA presence in Mexico	USDA APHIS
Ensure inspector safety	Implement security measures	USDA + State Dept. + Mexican Government
Leadership directive	Public commitment to reversal	President Trump, Sec. Rollins
Suspend noncompliant imports	Enforce trade conditionality	USDA
Inform stakeholders	Media + policy education	CAC + allies

The tools are already in hand. The only missing ingredient is political will.



CONCLUSION

THE TIME TO ACT IS NOW

The threat facing California's avocado industry is not theoretical, it is **happening now.** Since the withdrawal of USDA inspectors from Mexico in late 2024, dangerous avocado seed pests have been repeatedly detected in Mexican orchards and packinghouses. These pests, long excluded by strict inspection protocols, now pose a growing risk of crossing into California's pest-free growing regions. Once established, they cannot be eradicated. The consequences would be severe: billions in economic losses, the collapse of generational family farms, and the loss of one of America's most successful, clean, and sustainable agricultural commodities.

This crisis was preventable. It is still reversible.

For nearly 30 years, the U.S.-Mexico avocado trade operated under a clear, enforceable agreement that prioritized the protection of U.S. agriculture. That agreement was **unilaterally abandoned** by the Biden administration under pressure from cartel violence, without the knowledge or consent of the California Avocado Commission or its growers. In doing so, USDA forfeited the most effective tool it had to stop invasive pests at the border.



This report has laid out the facts:

- The collapse of enforcement directly preceded a spike in pest detections.
- These pests are concealed, undetectable in final form, and devastating once introduced.
- Mexico's self-regulated inspections have failed to contain the threat.
- The cost of inaction will be far greater than the cost of reestablishing enforcement.

"The prior administration allowed California farmers to be victimized by Mexican cartels rather than directing Mexico to correct the security problem or forego importing avocados into the United States."

— CAC Letter to USDA Secretary Rollins, March 2025

The California Avocado Commission respectfully but urgently calls on:

- President Donald J. Trump
- USDA Secretary Rollins

to take action immediately, and the:

- Members of Congress
- National agricultural press
- California state leaders

to **call for the reversal.** Reinstate the 1997 Operational Work Plan. Deploy security to protect U.S. personnel. Suspend Mexican exports if conditions are not met. And restore confidence in the U.S. government's ability to defend its food systems from foreign threats, criminal or biological.

California's avocado growers have done their part for decades—growing clean, sustainable fruit with minimal inputs and maximum care. They are now asking for nothing more than what they were promised: a level playing field and a government willing to defend its borders, not just from people or products, but from pests.

Final Call to Action:

The path forward is clear. The clock is ticking. The time to act is now.