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Commission Successfully Argues Threat of Avocado Seed Moth from Ecuador

In August 2018, the Animal and Plant Health Inspection Service published its proposed rule for the “Importation of Fresh Avocado Fruit From Continental Ecuador Into the Continental United States” in the Federal Register. California Avocado Commission staff, upon review of APHIS’ pest risk assessment, determined that APHIS had failed to identify avocado seed moth, *Stenoma catenifer*, as a significant economic pest of concern for California avocado producers.

Based on research from Dr. Mark Hoddle, University of California at Riverside, Commission staff knew the avocado seed moth would pose a major threat if it were introduced into California avocado groves. Avocado seed moth is exotic, and unlike the current situation in Ecuador, the pest is not present or established in the United States. The Commission submitted extensive comments to APHIS based on the reasonable likelihood of avocado seed moth being associated with Ecuadorian avocados at the time of harvest and remaining with the avocados, in viable form, throughout the harvesting process. We argued

that, if left unaddressed, the importation of avocados from Ecuador would represent a major threat to the quarantine security of the California avocado industry.

In addition, Commission staff traveled to Washington, D.C. to meet with senior APHIS staff and described in detail the scientific basis for our objection to APHIS moving forward with finalizing the proposal at that time. The Commission was calling for mandatory surveying of avocado production areas in Ecuador for avocado seed moth as part of the APHIS systems approach. APHIS’ proposal and supporting documents, the Commission argued, were critically deficient because they failed to analyze for and address the potential presence of the avocado seed moth.

In April 2021, APHIS issued a revised proposed rule that included the Commission’s demand for the surveying for avocado seed moth in the Systems Approach – phytosanitary measures put in place to safeguard against the introduction of pests. This was a direct result of the Commission’s vigorous response and engagement with APHIS on their

2018 proposal. APHIS now recognizes the threat Ecuadorian-grown avocados pose to California avocado producers because of the avocado seed moth, and the likelihood for and consequences of the avocado seed moth if it were introduced into California.

In our comments on the April 2021 revised proposed rule, the Commission stated: “The visibility of the Systems Approach relies in large measure, on the continuing commitment, including resources, of both the foreign avocado producers and the Ecuadorean National Plant Protection Organization to adhere to the various conditions that are established. The Commission is hopeful that the commitment is demonstrated. Again, our principal concern is assuring quarantine security for our industry.”

While the Commission cannot stop the importation of avocados into the United States, we remain vigilant in our efforts to ensure appropriate steps are taken to protect our industry from the introduction of invasive pests.

Based on the revised PRA, APHIS is proposing that commercial fresh avo-

cado fruit may be imported into the continental United States from continental Ecuador subject to the conditions outlined in the June 2018 proposed rule, as well as additional conditions designed to safeguard against avocado seed moth, *Stenoma catenifer*. These additional conditions are as follows:

- Avocados must be grown in pest free places of production for the avocado seed pest *Stenoma catenifer* that are established and maintained in accordance with international standards. APHIS must approve the survey protocol used by the National Plant Protection Organization of Ecuador to determine and maintain pest free status.
- If the avocados are grown in a municipality free of *Stenoma*

catenifer, the municipality must be surveyed every six months (twice a year) for the pest. Representative areas of the municipality where there are avocado trees, including production sites and urban areas, must be sampled.

- If the avocados are grown in a municipality not completely free of *Stenoma catenifer*, the NPPO of Ecuador can certify individual places of production as pest free. The surveys for pest free places of production must include representative areas from all parts of each registered place of production and a buffer zone of 1 kilometer. The places of production and buffer zone must be surveyed monthly for *Stenoma catenifer* from two

months before harvest until harvest is completed.

- If one or more *Stenoma catenifer* are detected during a survey or during any other monitoring or inspection activity, the place of production will be prohibited from exporting avocados to the continental United States until APHIS and the NPPO of Ecuador jointly agree that the risk has been mitigated.
- The NPPO of Ecuador must keep records of *Stenoma catenifer* detections for each place of production and update the records each time the places of production are surveyed. The records must be maintained for at least one year and provided for APHIS' review, if requested. 🍷

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