

Via Fax

29 May 2007

Standardization Section
Fresh Products Branch
AMS - USDA

RE: Docket AMS-FV-2007-0008; FV-06-310 Florida Avocados

To whom it may concern:

The Chilean Avocado Committee (Comite de Paltas de Chile) is a trade association that represents the Chilean Hass avocado industry. It works hand in hand with its sister association, the Chilean Avocado Importers Association (CAIA) in the promotion of Hass avocados in the U.S. marketplace. As you know CAIA is part of the Federal promotion program for Hass avocados that is under AMS oversight.

This past season - which extended from August 06 to April 07 - Chile exported to the U.S. more than 260 million pounds of Hass avocados. Chile only exports avocados of the Hass variety. Chile is also either the first or second largest supplier of imported Hass avocados to the U.S. marketplace depending in the year. Chile's exports to the U.S. are also complementary vis-à-vis California's Hass avocado production since we export our Hass avocados during the fall and winter months.

On behalf of the Chilean Avocado Committee, we present the following comments regarding the review of the U.S. Standards for Grades of Florida Avocados:

As you know, Florida production of avocados is limited to green skin varieties while imports from Chile are only of the Hass variety. Therefore we would like to respectfully request that grade requirements be limited only to avocados of the same Florida green skin variety and not Hass since Hass avocados are completely different than green skins.

Please note that Chilean Hass avocados have never had any problems meeting the grade requirements of the Florida marketing order. The issue here is that they are different and therefore Section 8c should only apply to avocado varieties that are covered by a Federal marketing order: green skin varieties.

Thank you for your attention to this request.

Xavier Equihua
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