



# FLORIDA CITRUS MUTUAL

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August 3, 2009

**Docket No. APHIS 2009-0023**

Regulatory Analysis and Development

PPD-APHIS-USDA

Station 3A-0.3.8

4700 River Road, Unit 118

Riverdale, Maryland 20737-1238

**Subject: Federal Register Comments – APHIS 2009-0023, *Citrus Canker; Movement of Fruit from Quarantined Areas***

To Whom It May Concern:

The Florida citrus industry is pleased and appreciative that on June 30, 2009 the United States Department of Agriculture-Animal and Plant Health Inspection Service (USDA-APHIS) published a proposal in the Federal Register modifying the current citrus canker regulations that govern interstate movement fruit from a quarantined area. This new proposal is underpinned by foundational science presented in recent research publications (Gottwald *et al.* 2009 and Shiotani *et al.* 2009). These international collaborative research efforts addressed the scientific uncertainties mentioned in the 2007 Risk Management Analysis (RMA). The USDA-APHIS is to be commended for following a logical and well defensible sequenced approach in building proposed regulations on thoroughly grounded, peer-reviewed international scientific findings.

Based on these new scientific findings, a supplemental RMA was created (May 2009) and five risk management options were evaluated. The scientific findings, supplemental RMA and secondary peer reviews are supportive of Option 2 as proposed by the USDA- APHIS to allow distribution of all types and varieties of commercially-packed citrus fruit to all U.S. States, subject to packinghouse treatment with an APHIS-approved disinfectant, but without the current inspection requirement at packinghouses.

The key science-based findings taken from the two recent publications (Gottwald *et al.*, 2009 and Shiotani *et al.* 2009) that were used to provide evidence needed to make the changes are as follow:

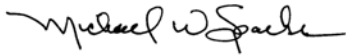
1. Shiotani's paper stated that *Xanthomonas citris* pv. *citri* (Xcc) was not detected on over 3,000 mature asymptomatic fruit harvested from severely infected Satsuma mandarin trees in Japan for two years, indicating that healthy and asymptomatic fruit are unlikely to harbor any detectable bacterial population that could transmit disease. Therefore, asymptomatic fruit produced and packed in a quarantine area with presence of citrus canker are safe to move interstate.
2. In both research publications, the investigators tried to establish an experiment to determine how Xcc on infected fruit or culls would survive and if fruit with canker lesions would induce new infections on host plant in an orchard under natural weather conditions that are conducive for citrus canker. From both experiments, Xcc populations on fruit diminished quickly to a very low level during the first 3-7 days. Both publications clearly demonstrated that fruit blemished with canker lesions did not cause new infections on susceptible trap citrus plants that were placed in close proximity under natural weather conditions. Analysis of two years of data collected from Japan concluded that there is a low risk of transmission of Xcc via unpacked fruit (Shiotani *et al.* 2009). The study conducted by Gottwald *et al.* 2009 concluded that harvested and packinghouse-disinfected citrus fruit are extremely unlikely to be a pathway to reach and infect susceptible citrus and become established in canker-free area.
3. Evidence from both publications undisputedly demonstrated that 1) infected fruit is at low risk to induce new infection in an orchard, 2) a Xcc population on fruit is reduced at least 50% after being disinfected and packed, 3) Xcc inoculum levels continue to decrease during shipment and storage, and after infected fruit are discarded in a citrus orchard; and 4) packinghouse-disinfected fruit do not induce new infection on healthy and intact citrus in an orchard under weather conditions that are suitable for canker to spread.
4. Florida packinghouses routinely inspect fruit for any blemishes, scars and/or lesions as a quality control to meet established fresh fruit packing standards. This process essentially eliminates any notable canker infected fruit from packing lines. The quantity of fruit with canker lesions after packing is very low and limited to very small blemishes.
5. Follow-up data collected by DPI plant pathologists to that which was published in Gottwald *et al.* (2009) demonstrates the continued absence of canker bacterial movement beyond the lesions present on commercial grapefruit fruit treated with sanitizer. No canker lesion appeared on

Duncan grapefruit seedlings placed adjacent to highly infected fruit (obtained from pre-entry at Florida commercial packinghouses) under the natural conditions of each of the four seasons of the calendar year.

We have reviewed both of the research papers (Gottwald *et al.* 2009 and Shiotani *et al.* 2009) and agree with the conclusions as put forth by USDA-APHIS-PPQ and strongly support Option #2 as set forth in the proposed rule. The transmission of Xcc from citrus fruit to a susceptible host, even under extreme artificial conditions is highly unlikely and that fruit that has been commercially packed and disinfected is not a viable pathway for establishing citrus canker into an area currently free of the disease.

Thank you for your consideration.

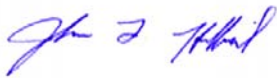
Regards,



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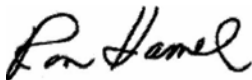
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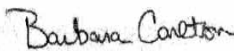
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