

(Response to FEDERAL REGISTER regarding the current rule changes to allow the importation of fresh blueberries from Uruguay in the USA.)

My name is Tom Payne, and I am a consultant to the North American Blueberry Council (NABC). Our organization was founded in the 1960s and represents highbush (cultivated) blueberry growers from throughout the United States and Canada. The purpose of our organization is to work cooperatively to create a dynamic and profitable industry now and in the future.

- NABC, along with the newly formed U.S. Highbush Blueberry Council (USHBC), have helped drive market demand for blueberries in the USA, increasing per capita consumption dramatically in the past two decades. This has been accomplished through funding of research on the health benefits of blueberries, promotions to consumers, foodservice and food processors. We have also worked on market development in export markets around the world and have been successful in Japan, Taiwan and other markets.

The key to our success has been our industry strategic planning, cooperation and communications.

Contrary to this spirit, we are taken by surprise by the recent publication in the Federal Register of rules that will allow imported blueberries from Uruguay, South Africa and Argentina into the USA. The information in the Federal Register is drafted as a governmental document. However, press releases that appear to have been published by organizations and producers from Uruguay lead us to believe that both the Uruguayan government and APHIS have authored the information in the Federal Register. For the purpose of this response and reply, we are referring to the Federal Register notice as “the document.”

- The author of the document notes that there was no input from U.S. producers of highbush blueberries in the planning or development of this plan to open the U.S. market to blueberries from Uruguay and South Africa. Information presented in the document related to our industry is out of date and does not reflect the current U.S. production and situation for fresh blueberry production and importation into the USA. We recommend that APHIS and the foreign authors of this document seek current information from the NABC yearly statistical report that clearly defines the U.S. market situation for fresh, processed and imported blueberries. This information is readily available. The NABC was instrumental in proposing and helping pass the legislation that created the U.S. Highbush Blueberry Council (USHBC), which is a national research and promotion program for the highbush blueberry industry with USDA oversight. During the process of governmental acceptance of this program, there was a considerable amount of information published on our industry including its structure, relationship with the global trade of blueberries and the overall need for the organization to work for an orderly global market for blueberries and blueberry products.
- The document presents an argument for processes that will mitigate phytosanitary conditions in Uruguay. Although the information may be complete and comprehensive, we are reluctant to accept the findings due to the haste in which these studies appear to have been conducted. Informational press releases have been issued by Uruguayan organizations praising parties

involved for preparing this information in “record time.” From a scientific standpoint, this alarms and worries our growers who do not wish our current production to be endangered by a politically motivated “green light” for foreign producers.

- We would like clarification on the import status of blueberries into Uruguay at this time. From our understanding, this country does not allow fresh blueberries from the USA or Canada. The production of blueberries in Uruguay is a 100-percent-export-oriented enterprise targeting the USA market. Although it is logical to assume that Southern Hemisphere blueberries will find markets in the USA during the winter months when our domestic blueberries are not in production, we are alarmed that there are no blueberries consumed in Uruguay. To the best of our knowledge producers have made no initiatives to develop their own domestic market or the South American market for their blueberries. We get hundreds of contacts each year from potential blueberry producers who have learned of the success of blueberries. In this context “cooperation” means the new producers want to capitalize on our decades of market promotion and sell in our market. Most current shippers from the Southern Hemisphere have studied our market, work within our current produce distribution channels, attend our meetings and have succeeded through real “cooperation”.
- Information in the Federal Register describes a static season and window of opportunity for Uruguayan producers. This is actually not the case as the U.S. and world production of blueberries has been developing at a rapid pace over the past few years. New U.S. varieties have allowed our growers to extend their blueberry season well into the traditional off-season periods. Our growers are planting new acres in Florida, California and even Hawaii and it is not out of the question that we will eventually see year round blueberry production here in the USA. We are also concerned that the rapidly expanding production in the Southern Hemisphere may eventually disrupt the current market for blueberries.
- The North American blueberry industry is part of a global blueberry industry, and we maintain close commercial and horticultural connections around the world with most every producing country, though to date there has been little communication with Uruguay. Most countries, such as Japan which has a domestic fresh blueberry industry, rely on cooperation with our industry and a two way flow of information and commerce. This has resulted in a dynamic market in Japan for both U.S. and Japanese blueberries. We have also have favorable and cooperative relations with the blueberry industry in Chile. A major exception to this cooperation has been the Republic of Korea. (South Korea). We bring this to the attention of APHIS since for the past five years we have been requesting assistance in opening the South Korean market to U.S. fresh blueberries. Korean farmers, consumers and just about everyone on the peninsula is in favor of fresh blueberry imports from the USA. There are no valid phytosanitary concerns related to U.S. fresh blueberries. Our continued requests to APHIS in Washington D.C. and to APHIS representatives in Seoul have not been heard. Given the lack of response to our South Korean concerns to date, in our view, APHIS has taken the interest of Uruguayan and South African blueberry growers over those of U.S. growers and has set up an expressway for their market entry, while ignoring our interests and requests to open the South Korea to U.S. fresh blueberries.

The North American Blueberry Council (NABC) strongly urges APHIS to suspend the rules for importation of fresh blueberries from Uruguay and South Africa into the USA until a comprehensive study on the potential impact on the U.S. blueberry industry (from a horticultural and market situation) is completed. We also plan to ask our members to contact their Senators and Congressional representatives and advise them of this current situation and ask them to investigate the lack of progress and action by APHIS on behalf of U.S. blueberry growers concerning access to the Republic of Korea market for fresh U.S. blueberries.

*aphis-uruguay draft 2 June 07*