



January 5, 2017

Deputy Administrator Miles McEvoy
National Organic Program
United States Department of Agriculture
1400 Independence Avenue, SW
Washington, DC, 20250

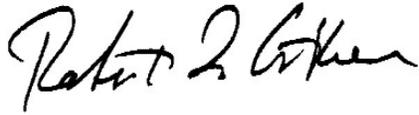
Deputy Administrator McEvoy:

United Fresh Produce Association is writing to request that the Agriculture Marketing Service (AMS) delay the implementation of the recently announced requirement for import certification for all organic products traded between the United States and Mexico. While we reserve judgement on the merits of the proposed new regulations, pending further review, we believe the sudden nature of this announcement and the multiple questions that industry stakeholders will need answered before they can comply warrant a delay in implementation.

More specifically, it would be very helpful to the fresh produce industry to have a greater understanding of such issues as the justification for the new program; how these new requirements will improve consumer confidence; how certifying agents attain that status; what costs will be associated with the new requirements and how this new certification differs from current requirements for organic providers.

The proposed regulations have the potential to have a significant impact on fresh fruit and vegetable providers. Given that the new requirements were announced just before the start of the holiday season and informational webinars for certifiers and importers are scheduled a mere week before the requirements take force, it is imperative that stakeholders be given more time to assess and gather information on what the new requirements will mean for their operations.

Therefore we respectfully urge that the agency delay the implementation of the requirements and undertake a vigorous effort to engage affected members of the produce industry to garner their input on the impact of the proposed requirements. United Fresh stands ready to do whatever we can to facilitate such engagement. We look forward to working with you on this and any other issues relevant to the fresh fruit and vegetable industry. Thank you for your time and attention.

A handwritten signature in black ink, appearing to read "Robert Guenther". The signature is fluid and cursive, with the first name "Robert" being larger and more prominent than the last name "Guenther".

Robert Guenther
Senior Vice President, Public Policy
United Fresh Produce Association