



May 19, 2017

The Honorable Sonny Perdue Secretary
US Department of Agriculture
1400 Independence Ave. SW Washington, DC 20250

Dear Secretary Perdue:

On behalf of United Fresh Produce Association, I am writing in support of the TASC grant application to develop an EU Maximum Residue Level (MRL) Early Notification System and to add new markets to the Grower Priority MRL Database. This TASC grant is being submitted to USDA by Bryant Christie Inc. with the support of the Minor Crop Farmer Alliance, of which United Fresh is a member.

United Fresh Produce Association has been in existence since 1904 and represents growers, shippers, processors and retailers across the country of fresh fruits and vegetables. United Fresh is a leading advocate for the fruit and vegetable industry on a variety of issues. One key issue is the ability of growers to have all the tools they need to enhance their ability to operate in international markets. We believe the database under consideration would be a valuable asset to growers and processors to effectively export their products.

This project would add new features to the database that will make it even more useful. Our members have told us they need an early warning notification system for MRL changes that are frequently proposed by the European Union. The EU's hazard based approach to MRLs has resulted in many being lowered or withdrawn. The EU system has not been transparent and our members report that comments through the World Trade Organization are only accepted at the very end of a lengthy two year review process and then largely ignored. As a result, MRLs are often changed before the impacted industry has a chance to make a case to maintain the MRL.

The grower priority MRL database and the development of an early notification system are critical to trade and a successful export market. Thank you for your time and attention and we look forward to working with you on this and other issues of importance to the fresh fruit and vegetable industry.

Sincerely,

A handwritten signature in black ink that reads "Robert Guenther".

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

