

NORTHWEST HORTICULTURAL COUNCIL  
105 SOUTH 18th STREET, SUITE 105  
YAKIMA, WASHINGTON 98901 USA  
(509) 453-3193 FAX (509) 457-7615  
www.nwhort.org

November 15, 2013

William Shpiece  
Acting Chair, Trade Policy Staff Committee  
Office of the U.S. Trade Representative  
600 17th Street  
Washington, DC 20508

Dear Mr. Shpiece:

The Northwest Horticultural Council and Northwest Fruit Exporters submit these comments to assist the Trade Policy Staff Committee identify significant barriers to U.S. exports for inclusion in the National Trade Estimate Report on Sanitary and Phytosanitary Measures. These comments apply to apples (0808.10), pears (0808.20), and cherries (0809.20).

Sincerely,

NORTHWEST HORTICULTURAL COUNCIL



Mark Powers  
Vice President

NORTHWEST FRUIT EXPORTERS



James Archer  
Manager

MP

## Submission for the 2014 National Trade Estimate Report on Sanitary and Phytosanitary Measures

### ARGENTINA

#### *APPLES and PEARS*

- **Phytosanitary Prohibition on Apple and Pear Imports**

Argentina is no longer issuing import permits for apples and pears from the United States. Suspension of imports occurred sometime prior to 2009, apparently due to concerns about the transmission of *Erwinia amylovora* (the bacteria causing fire blight) via apple and pear fruit. In 2009 USDA/APHIS submitted technical information to Argentine plant health officials documenting that the risk of transmitting the bacteria on mature symptomless apple and pear fruit is very low. There has not been any response to this letter. Rather, Argentina has begun a new pest risk assessment on apples, to replace the one conducted in 2005, indicating that this assessment will be used to determine the Import Permit requirements for apples. A separate assessment for pears will also be generated.

Argentina's actions are designed to prohibit trade, in keeping with its policy to discourage imports of food products. There have been no reported pest detections in U.S. apple and pear shipments to Argentina, a small niche market with a one or two month shipping season.

Given the very low phytosanitary risk posed by U.S. apple and pear exports, Argentina should agree to issue Import Permits with the requirements in effect prior to 2009. Any technical plant health concerns can be resolved while trade is allowed to continue.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in Argentina would result in an increase of less than \$5 million per year in sales.

#### *CHERRIES*

- **Phytosanitary Prohibition on Cherry Imports**

The Government of Argentina prohibits the importation of Pacific Northwest cherries into the country due to concerns over cherry fruit fly and other insect pests. This trade barrier has been in place since the mid-1990s.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in Argentina would result in an increase of less than \$5 million per year in sales

## **Submission for the 2014 National Trade Estimate Report on Sanitary and Phytosanitary Measures**

### **AUSTRALIA**

#### *APPLES*

- **Phytosanitary Barrier**

Until the year 2011 Australia prohibited the importation of apples from all origins. A change in import policy is emerging as apples from the People's Republic of China first landed in Australia in 2011. Australia allowed apples from New Zealand to be imported in 2011 following New Zealand's successful WTO dispute settlement case against Australia and its unjustified pest mitigation measures. We are not aware of any apples being exported from New Zealand to Australia, due to costly work plan requirements.

Pacific Northwest apple growers, packers and shippers have been working to obtain market access to Australia for their fruit for over fifteen years. Australia prohibits the importation of apples from the United States due to a number of expressed phytosanitary concerns. Chief among those concerns is fire blight, a bacterial disease of apple and pear trees known to occur in Pacific Northwest fruit growing regions. The USDA Agricultural Research Service, in coordination with New Zealand plant scientists, published research which shows that there is no risk of fire blight transmission if exports are restricted only to mature, symptomless commercial apples. The data associated with this research was submitted to Australia in December 2000. These findings were confirmed by World Trade Organization (WTO) rulings against Japan in 2005 and its import prohibitions against Pacific Northwest apples related to fire blight. (Japan has since removed its fire blight restrictions on U.S. apples).

In October 2009, Biosecurity Australia finally published its Pest Risk Assessment (PRA) for Pacific Northwest apples. Australia's process is on hold in response to a U.S. request to "stop the clock" (a provision that halts the PRA process) so that industry and U.S. plant health officials can consider how to address Australia's plant health concerns specific to newly discovered post harvest decay fungi.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in Australia would result in an increase of \$5 to \$25 million in sales each year.

- **Phytosanitary Barrier**

Australia currently prohibits the importation of pears from the United States due to a number of phytosanitary issues. A key issue is the bacterial disease fire blight caused by the bacteria *Erwinia amylovora*. Australia is concerned that this disease might be transmitted to the country's domestic apple and pear crops. Research published in 2007 demonstrated that mature, symptomless pears do not support populations of the fire blight bacteria and are not part of the pathway.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in Australia would result in an increase of less than \$5 million in sales each year.

## Submission for the 2014 National Trade Estimate Report on Sanitary and Phytosanitary Measures

### EUROPEAN UNION

#### *CHERRIES*

- **Phytosanitary Trade Barriers**

The European Union requires cherries to be free of *Monilinia fructicola* (brown rot) and requires documentation that controls have been applied in the field. This restriction limits the supply of cherries that qualify for export to the EU.

*M. fructicola* reportedly occurs in Europe yet there are not known to be official controls on the disease or on movement of fruit within the EU from those countries where positive detections have been made. The U.S. should obtain from the EU an official report on the presence of *Monilinia fructicola* and supporting technical documentation justifying its quarantine requirements.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in the European Union would result in an increase of less than \$5 million in sales each year.

#### *Pesticide Maximum Residue Level Policy*

In December of 2009 the European Union began the process of establishing EU wide maximum residue levels for plant protection products. That process involves a comprehensive review of hundreds of chemical compounds. The EU risk assessment process is not the same as that conducted by the United States Environmental Protection Agency and this can lead to the establishment of a different regulatory maximum residue level (MRL) for a particular pesticide and a potential barrier to trade. Of significant concern is the decision regarding diphenylamine (DPA), used in the U.S. for scald control on apples. The EU has banned the use of DPA in Europe and on August 8, 2013 published its official notification lowering the DPA MRL to 0.1 ppm, while explaining that no final consumer risk assessment had been performed. Rather, the decision was taken as a precaution “due to several data gaps noted” by the European Food Safety Authority. The new MRL will go into effect approximately six months from now on March 2, 2014.

- **Potential Increase in Exports**

Absent a solution on DPA, the significant reduction of the import tolerance for this product will largely close the European Union to U.S. apple growers resulting in an estimated annual loss in sales of \$5 to \$25 million per year.

## Submission for the 2014 National Trade Estimate Report on Sanitary and Phytosanitary Measures

### INDONESIA

#### APPLES

- **Phytosanitary Trade Barrier**

On March 27, 2006 Indonesia implemented a plant health regulation (Minister of Agriculture Regulation Number 37/Kpts.60/1/2006) governing the importation of fruits and vegetables into Indonesia. The regulation requires various mitigation treatments for apples to control fruit flies. These regulations were not preceded by any formal pest risk analysis, pest interceptions on imports or immediate (perhaps any) evidence of risk to domestic production from U.S. apples. On June 13, 2012 Indonesia superseded Regulation 37 with Regulation 42, absent any formal pest risk assessment of notification to the WTO.

The regulation disregards important technical facts and international standards by requiring treatment of apples even though some of the pests do not attack apples or the apples come from production areas that are free from the pests of concern. It also requires treatment of apples even though Indonesia does not have host material for some of the fruit flies and lacks a climate suitable for establishment and spread of fruit flies occurring in the Pacific Northwest.

The U.S. government has provided detailed technical information to support its request for revisions to the regulation, beginning with comments that were submitted to Indonesia through the World Trade Organization in August of 2005.

In August of 2007, following extensive work by USDA/APHIS and USTR, Indonesian officials agreed to an in-transit cold treatment protocol that remains in effect and allows trade to continue. However, if this treatment option were to be modified it could easily close or disrupt the market resulting in significant losses to shippers. It is important that technical dialog continue so that scientific information and international standards are incorporated into Decree 42 thereby reducing the risk of market disruption.

- **Potential Increase in Exports**

Once Decree 42 is amended to reflect internationally accepted plant health standards and risk, industry would expect an increase of less than \$5 million in yearly export sales.

## *CHERRIES*

- **Phytosanitary Trade Barrier**

On March 27, 2006 Indonesia implemented a plant health regulation (Minister of Agriculture Regulation Number 37/Kpts.60/1/2006) governing the importation of fruits and vegetables into Indonesia. The regulation requires various mitigation treatments for cherries to control for fruit flies. These regulations were not preceded by any formal pest risk analysis, pest interceptions on imports or immediate (perhaps any) evidence of risk to domestic production from U.S. cherries. On June 13, 2012 Indonesia superseded Regulation 37 with Regulation 42, absent any formal pest risk assessment of notification to the WTO.

The regulation disregards important technical facts and international standards by requiring treatment of cherries. It also requires treatment even though Indonesia does not grow cherries nor are cherry fruit fly hosts present and, therefore, the various cherry fruit flies that are in the Pacific Northwest will not survive in Indonesia.

The U.S. government has provided detailed technical information to support its request for revisions to the regulation, beginning with comments that were submitted to Indonesia through the World Trade Organization in August of 2005. To date, (November 2013) Indonesia refuses to resolve the problems affecting the importation of cherries. Cherries from the Pacific Northwest should be removed from Decree 42 as a commodity of concern to Indonesia.

- **Potential Increase in Exports**

There are currently few cherries exported to Indonesia. Resolution of this trade barrier will allow for future growth in sales. Industry estimates an increase of less than \$5 million in yearly export sales the first year the phytosanitary barrier is eliminated.

## *PEARS*

- **Phytosanitary Trade Barrier**

On March 27, 2006 Indonesia implemented a plant health regulation (Minister of Agriculture Regulation Number 37/Kpts.60/1/2006) governing the importation of fruits and vegetables into Indonesia. The regulation requires various mitigation treatments for pears to control for fruit flies. These regulations were not preceded by any formal pest risk analysis, pest interceptions on imports or immediate (perhaps any) evidence of risk to domestic production from U.S. pears. On June 13, 2012 Indonesia superseded Regulation 37 with Regulation 42, absent any formal pest risk assessment of notification to the WTO.

The regulation disregards important technical facts and international standards by requiring treatment of pears for pests that do not attack pears. It also requires treatment of pears even though Indonesia does not have host material for some of these fruit flies and lacks a climate suitable for establishment and spread of fruit flies occurring in the Pacific Northwest.

The U.S. government has provided detailed technical information to support its request for revisions to the regulation, beginning with comments that were submitted to Indonesia through the World Trade Organization in August of 2005.

Pears from the Pacific Northwest should be removed from Decree 42 as a commodity of concern to Indonesia.

- **Potential Increase in Exports**

Once the regulation is amended to reflect internationally accepted plant health standards and risk, industry estimates an increase of less than \$5 million per year in export sales.



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### ISRAEL

#### *CHERRIES*

- **Phytosanitary Issues**

Israel does not allow U.S. sweet cherries to enter the country. Concerns regarding plant pests and diseases are said to be the reason. In June of 2002, USDA/APHIS requested that Israel conduct a pest risk assessment (PRA) on Pacific Northwest cherries. It is not clear why Israel has yet to finish its PRA on U.S. cherries.

Over the decade plus time frame the U.S. cherry market access request has been under review the United States has completed a number of pest risk assessments for Israeli plant products. For example, in 2013 the U.S. made progress on at least two plant product market access requests of importance to Israel. In January the U.S. concluded that fresh dates from Israel could be safely imported. In October progress was announced regarding Israel's request to export fresh pitahaya or dragon fruit to the U.S.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in Israel would result in an estimated increase of less than \$5 million in sales each year.

#### *PEARS*

- **Phytosanitary Issues**

U.S. pear exporters have a long history of shipping to Israel with no report of any detection of apple maggot (*Rhagoletis pomonella*). The U.S. reached an agreement in principle to allow shipment of firm or hard pears without cold treatment. Firm or hard pears are a conditional non-host for apple maggot. However, it is not clear that Israel has taken steps to formally implement this understanding when issuing phytosanitary guidelines for pear imports from the U.S.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in Israel would result in an estimated increase of less than \$5 million in sales each year.

## Submission for the 2014 National Trade Estimate Report on Sanitary and Phytosanitary Measures

### JAPAN

#### *APPLES*

- **Phytosanitary Trade Barrier**

Japan maintains a fumigation requirement on U.S. apples, which significantly increases the cost and reduces the quality of apples shipped to Japan.

- **Potential Increase in Exports**

U.S. apples are not exported to Japan due to the methyl bromide fumigation requirement. If the fumigation restrictions cited above were eliminated, Japan could grow into a \$10 million per year market in the near term and larger in the long term.

#### *PEARS*

- **Phytosanitary Barrier**

Japan currently prohibits the importation of pears from the U.S. due to alleged concerns regarding the bacterial disease fire blight. Japan is concerned that this bacterial plant disease might be transmitted to the country's domestic crops. The U.S. position is that mature, symptomless fruit produced under commercial conditions have not been shown to transmit the disease. Research substantiating the U.S. position was completed in 2007 and is in the hands of USDA/APHIS.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in Japan would result in an increase of less than \$5 million in yearly sales.

#### *Pesticide Maximum Residue Level Sanction Policy*

In 2012 the U.S. Trade Representative met with Japanese officials to negotiate changes in the penalty structure for MRL violations. Formal penalties for violations include initially elevated inspection rates for shippers of the commodity that can be expanded to 100 percent hold and test for the entire commodity group if a second violation occurs. The USTR negotiations resulted in a written agreement that provided substantive relief, but no official Japanese policy changes have occurred. We urge USTR to remain vigilant on this important issue with Japan. Also, we ask that the U.S. continue to work with Japanese

officials to improve the registration process for pesticides used postharvest to treat fruits and vegetables. We understand that talks are now underway to streamline the process of obtaining food additive tolerances but continued communication with industry is critical to ensure that any agreement reached represents real improvement.

- **Potential Increase in Exports**

Reaching formal agreement on an MRL sanctions policy and food additive tolerances with Japan will help to reduce risk exposure and maintain access to this \$55 million to \$82 million annual export market for U.S. cherries.

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### MEXICO

#### STONE FRUIT

- **Phytosanitary Issues**

Peach and nectarine growers in Idaho, Oregon and Washington have been seeking access to the Mexican market under a systems approach for control of *Grapholita molesta* (oriental fruit moth [OFM]) since 2004. These same growers currently ship apricots to Mexico under a systems approach for OFM and also have successfully exported peaches and nectarines to British Columbia, Canada, under the OFM systems approach protocol proposed to Mexico. OFM has never been detected in stone fruit shipments to British Columbia, Canada, or in apricots to Mexico. Mexico is requiring the presence of on-site inspectors to monitor the program. This is not required for the apricot systems approach and is not needed for the peach and nectarine program. Mexico has explained that in order for the on-site verification requirement to be dropped it must first change its federal regulation making this a requirement. The NHC requests that USTR and USDA FAS work with the Mexican government to make this regulatory change. This process was also followed in order for apricots to be exported to Mexico without the on-site inspector requirement.

- **Potential Increase in Exports**

Upon gaining market access we would expect initial yearly sales of less than \$5 million.

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### REPUBLIC OF KOREA

#### *CHERRIES*

- **Phytosanitary Barrier**

South Korea requires that cherries from the U.S. undergo fumigation with methyl bromide before shipment to control various pests of quarantine concern. Fumigation with methyl bromide shortens the shelf life and affects the eating quality of fruit. The U.S. cherry industry would like to eliminate this requirement and is working with USDA/APHIS to this end. A systems approach work plan was presented to the Korean National Plant Quarantine Service in June of 2008. In 2013 Korea rejected the U.S. proposal and technical plant health discussions continue in an effort to convince Korean officials that the U.S. proposal adequately addresses Korea's plant health concerns.

- **Potential Increase in Exports**

Removal of the fumigation requirement will increase shelf life and allow for fruit to be shipped via ocean vessel rather than air freight, thus reducing costs. Lower cost combined with an improved eating quality of fruit should increase sales. During the 2013 season the Pacific Northwest cherry growers, packers and shippers exported approximately \$24.6 million (FOB). Obtaining approval for the use of a systems approach to export U.S. cherries to the Republic of Korea would result in an estimated increase of approximately \$5 million in yearly sales initially, with further expansion of the market occurring over time.

#### *Pesticide Maximum Residue Level Testing Policy*

During the Pacific Northwest 2011 and 2012 cherry season exporters experienced periodic costly delays clearing Korea's import inspection process due to that country's pesticide residue monitoring program.

Korea actively monitors chemical residues in imported fruits. The Korean Food and Drug Administration (KFDA) detains shipments and conducts a 51 chemical multi-residue screen in two situations. The first is when a new packinghouse/exporter/importer combination, not previously tested, is noted at time of customs clearance. Also, KFDA conducts a random hold and test pesticide residue detection program, not expected to exceed 5% of the shipments of any commodity.

In addition to the multi-residue test for the 51 known chemicals, each quarter an additional three chemicals not covered by the multi-residue test are targeted for single-residue testing on selected produce. KFDA selects these three from a universe of 181 chemicals. Single residue tests are solely conducted by KFDA, and neither the chemicals nor the specific produce selected for testing are publicly disclosed. Therefore, it is unknown whether or when cherries are subject to single residue testing. Also, for each new packinghouse/exporter/importer combination, a newly instituted test for lead residues is required. Fruit can be moved to customers' cold storage facilities while awaiting testing results. While most loads clear customs the day submitted, USDA/FAS personnel in Seoul indicate that loads submitted for customs clearance later in the week may not clear customs in time for weekend promotions if randomly chosen for pesticide residue testing.

Korea's test and hold procedure represents a punitive action resulting in market disruption and fruit quality loss when fruit is held without any evidence that residue violations are likely. To date there have not been any violations of Korea's pesticide residue levels associated with Pacific Northwest cherries.

USDA and USTR should continue to work with KFDA and seek a modification of this program that either exempts Pacific Northwest fruit because of our positive track record or limits the program to sample and release testing until violations are noted in the commodity.

- **Potential Increase in Exports**

Modifying KFDA's pesticide monitoring process as it is applied to Pacific Northwest cherries will allow this highly perishable and time sensitive fruit to arrive in time for weekend promotion programs and the busiest time during the week for consumer purchases at retail, thus potentially increasing sales.

## *APPLES & PEARS*

- **Phytosanitary Barrier**

South Korea prohibits the importation of apples and pears from the United States due to phytosanitary concerns. Korea's expressed concerns are myriad and the discussions with the U.S. long standing (going back into the mid-1990s). At this time, the technical plant health discussions are largely dormant with focus on other commodities of interest.

- **Potential Increase in Exports**

Resolving the phytosanitary barriers in South Korea for apples and pears would result in yearly sales of \$5 million to \$25 million of these two tree fruits.

## Submission for the 2014 National Trade Estimate Report on Sanitary and Phytosanitary Measures

### SOUTH AFRICA

#### APPLES

- **Phytosanitary Barriers**

Pacific Northwest apples first gained market access to South Africa in 2009, but only for apple fruit originating from orchards that are declared pest free for *Rhagoletis pomonella* (apple maggot). During the 2010-2011 season, numerous containers of apples exported to South Africa were detained for reported quarantine pest finds. Notifications from South Africa of alleged interceptions are generally lacking in sufficient detail and are often issued many weeks after the interception. This severely limits the U.S. industry in any efforts to research the issue and to correct a problem, should one exist.

Additionally, South Africa has failed to respond to a USDA request to amend the market access agreement now in place for Pacific Northwest apples with a cold treatment protocol. Such a protocol would permit the export of apples originating from areas regulated for apple maggot. That request was first issued in June 2010.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in South Africa would result in an estimated increase of less than \$5 million in yearly sales.

#### CHERRIES

- **Phytosanitary Prohibition on Cherry Imports**

South Africa currently prohibits the importation of cherries from the United States due to a number of phytosanitary issues.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in South Africa would result in an increase of less than \$5 million in yearly sales.

- **Phytosanitary Barrier**

South Africa currently prohibits the importation of pears from the United States due to phytosanitary concerns.

- **Potential Increase in Exports**

Resolving the phytosanitary barrier in South Africa would result in an increase of less than \$5 million in yearly sales.



## Submission for the 2014 National Trade Estimate Report on Sanitary and Phytosanitary Measures

### TAIWAN

#### APPLES

- **Phytosanitary Barrier**

Codling moth (CM) is a pest of apples in the U.S. and a pest of quarantine concern to Taiwan. Following a detection in Taiwan in 2002 and resulting market closure, the two countries negotiated the *Systems Approach Work Plan for the Exportation of Apples from the United States to Taiwan*. Since the establishment of the work plan in 2002, a significant research effort has been underway to discover if codling moth should be considered a serious pest of quarantine concern for Taiwan. Ten years later mounting evidence indicates that codling moth is not only highly unlikely to arrive in Taiwan, it is very likely it cannot survive let alone become established in that country. Research conducted by Dr. Lisa Neven of USDA/ARS, can be used to make a strong argument that the work plan is not based on scientific principles and is being maintained without sufficient scientific evidence. Many sections of the work plan should be revised if not completely eliminated as they were arbitrarily established and are now known to be more trade-restrictive than required to achieve the appropriate level of phytosanitary protection.

A USDA Animal and Plant Health Protection Service technical document finished in October of 2006 supports industry's position. The document is titled *Quantitative risk assessment for the introduction and establishment of codling moth, Cydia pomonella (Linnaeus) (Lepidoptera:Tortricidae), associated with apples exported from the Pacific United States (including the states of Idaho, Oregon, Washington and California) to Taiwan*. The results of this assessment demonstrate that based on the environmental requirements for codling moth to complete its lifecycle, the climate in Taiwan and the very low rate of CM infestation, apple shipments from the U.S. are a very low risk pathway for codling moth establishment in Taiwan. There is a 99 percent chance that it would take at least 10,091 years before a mating pair of codling moths would occur in Taiwan as a result of U.S. apple shipments. Based on this risk assessment, and research conducted by Dr. Lisa Neven, industry requests that USDA and USTR seek modifications to the work plan.

After more than 25 years of apple shipments (totaling over 7 billion apples), Taiwan does not have codling moth. Either U.S. methods of shipping apples mitigate the risk to levels below quarantine concern or codling moth cannot survive in Taiwan or both.

The NHC gratefully acknowledges this year's successful modification of the penalty system in the apple work plan. The new penalty system reduces the risk that Taiwan will close its market as a result of codling moth detections in U.S. apples. However, the scientific research increasingly supports industry's claim that Taiwan's requirements for codling moth remain overly restrictive. The U.S. government should continue to engage with Taiwan to correct this trade barrier.

- **Potential Increase in Exports**

Modifying the Taiwan apple work plan would result in an increase of less than \$5 million in yearly sales.

### *Lack of Pesticide Maximum Residue Levels*

- **Phyosanitary Barrier**

In early 2009 the government of Taiwan took action related to previously unannounced increased enforcement of its pesticide maximum residue level (MRL) policy for imported food and this led to some disruption of trade for Pacific Northwest apple growers and shippers. Taiwan currently has very few MRLs for imported fruits and other specialty crops and does not have an adequate system to keep up with the continuing changes in pest management tools available to U.S. growers.

The Northwest Horticultural Council requests that the U.S. government continue to work with the government of Taiwan to generate another current priority list outlining the pesticide MRLs to establish in Taiwan.

- **Potential Increase in Exports**

Establishing pesticide MRL tolerances in Taiwan will not necessarily increase the amount of exports from the U.S. It will help to maintain access to this \$60 million to \$70 million annual export market for U.S. apples, pears and cherries.

## Submission for the 2014 National Trade Estimate Report on Sanitary and Phytosanitary Measures

### VIETNAM

#### *APPLES, PEARS & CHERRIES*

- **Transparency in Import Procedures**

Vietnam is currently reviewing its plant quarantine regulations and has issued pest risk assessments for apples, pears and cherries. These PRAs may affect the ability of U.S. growers to continue to sell fruit to Vietnam. Pacific Northwest fruit has been exported to Vietnam for many years. Apples, for instance, have been exported to Vietnam for over a decade without incident. Although it is within Vietnam's right as a sovereign country to review its quarantine regulations, any such review should not limit trade of products that have not had any quarantine concerns.

As Vietnam assesses the plant health risk posed by U.S. apple, pear and cherry fruit imports, it is important that it does so in a transparent manner and that any new regulations take into account international standards and are based on sound science and a realistic assessment posed by commercial shipments.

- **Potential Increase in Exports**

Vietnam is a growing market for Pacific Northwest apple exports. Both the Pacific Northwest pear and cherry industries are exploring how they can grow the market as well.

If market access requirements are transparent and based on international standards, they should not restrain sales and significant expansion of yearly Pacific Northwest fruit sales should occur at levels toward the upper end of the \$5 million to \$25 million range.