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Agricultural Marketing Service
U.S. Department of Agriculture
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Dear Ms. Emery:

Re: United States Standards for Grades of Florida Avocados
Docket # AMS-FV-2007-0008; FV-06-310,
Fed. Reg. 3/29/07, Vol. 72, No. 60, page 14709

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Arlington, VA, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to again submit comments to USDA and hope our perspective is helpful. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. Those members responding expressed several concerns about the viability of the proposal.

Our members have a particular concern with how the U.S. Grade Standards for Florida Avocados would apply to skin color, particularly the unique skin of Hass Avocados. There are times during the growing season when Hass Avocados exhibit "shading" or dark skin color, but the quality and condition of the fruit is not diminished. The fruit remains firm and is of good quality. This is unique to Hass Avocados and it is critical that the proposed grade standard allows for differences in skin color of various varieties.

The U.S. Grade Standard for Florida Avocados attempts to take varietal differences into consideration. Specifically, Section 51.3062 Well Colored, of the U.S. Grade Standard for Florida Avocados, states that “Well colored” means that the avocado has the color characteristics of the variety. Similar language appears in Section 51.3066 Fairly Well Colored, where it states “Fairly Well Colored” means that the avocado shows a shade of color which is fairly characteristic of the variety. Yet, Sections 51.3064, 51.3067 and 51.3069 lay out specific percentages of the fruit’s surface that are allowed to be discolored before it is considered Damage, Serious Damage, or Very Serious Damage.

When aggregating varieties of avocados under one grade standard, USDA Inspectors must be keenly aware of the differences in skin texture, color and the unique ripening process of all included varieties for the grade standard to be applied fairly and accurately.

I hope these insights are helpful and please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,



Patrick A. Davis
President