

## ***The Political Quid Pro Quo***

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Many people in American agriculture are under the misguided impression that the California avocado industry's opposition to USDA's proposal to relax the long-standing quarantine on Mexican avocados is based on economics, not science. Well, here's the answer to that it's not true. It's not true by any measure.

Take a few moments to review the dynamics behind this issue, and you'll quickly see how political maneuvering has eviscerated the USDA's scientific integrity and put American agriculture at risk to a multi-billion dollar pest infestation. All in the name of a "new world order" and our government's expansionist trade policy. All in the "spirit of NAFTA." It's an egregious miscarriage of our plant protection system.

USDA is moving away from an "exclusion" plant protection philosophy to "systems science" in its efforts to deal with pests and the threat they pose to our crops. True, the expansion of agricultural trade requires new solutions to phytosanitary problems, and that systems science may well play a role in that expansion. But before a proper system can be built, an accurate assessment of risk — the extent of the problem you are trying to manage — must be made.

Using systems science to analyze and manage risk requires a considerable degree of expertise. USDA officials have stated that they are committed to "using the most up-to-date risk assessment methods possible" and "the best science" to modify the quarantine on fresh avocados from Mexico, but are they really up to the task?

The US Congress' Office of Technology Assessment (OTA) doesn't think so. After a comprehensive review of recent USDA decisions involving exotic pests, OTA reported: "a basic policy hampers USDA's success at keeping out pests — that is, its willingness to allow many types of imports that pose unanalyzed or incompletely analyzed risks." A close look at the facts of the Mexican avocado decision bears this out.

USDA's proposed system for Mexican avocados is based on pest survey data from 1994 — data which was not only incomplete, but sharply contradicted by more recent field data. For USDA, the 1994 data was enough. Even though fruit fly trapping in 80 percent of the groves was conducted for less than one year, USDA felt it sufficient to calculate risk. Even though one-third of all groves trapped for five weeks or less, USDA said it was enough to show that populations were at "low levels." And even though groves were sampled only once for weevils, it was enough for USDA to declare four municipalities "pest-free."

Over 200 pages of official Mexican field records from 1995 and 1996 show weevil infestations in 56 orchards totaling over 1,500 acres. Weevils were found in every

orchard sampled in November and December 1995, two of the four winter months when USDA plans to permit the importation of Mexican avocados. The records also showed that fruit flies were detected in every orchard where trapping was conducted, despite a rigorous program of chemical treatment. Nearly 120 flies were captured in only 12 weeks!

To make matters worse, it is now known that Mexico failed to supply damaging records documenting pest infestations in 1994 when USDA requested them. This became apparent when records from 1994 showing heavy seed weevil infestations in Michoacan surfaced, for the first time, in 1996.

USDA's acknowledgment that it "did not supervise" pest surveys conducted in Mexico and the new evidence of widespread pest infestation point to a single, compelling conclusion — that the USDA did not properly analyze the pest risk associated with Mexican avocados.

There is no other explanation for the following difference: USDA claims that with its system in place, it would take over one million years for fruit flies to become established in the US.

Yet the nation's leading risk assessment experts said, "We are aware of no other safety program that achieves this level of risk reduction." Scientists at Cornell University, using USDA's own model, predicted that establishment would occur in as little as 3½ years.

What does all of this mean? It means that all commodities are at risk because the Mexican avocado proposal is not based on the best science as USDA would have us believe. It means that political maneuvering, not science is driving US phytosanitary policy. It means that USDA's importation system for Mexican avocados is a disaster waiting to happen, since it is founded on a gross miscalculation of risk.

Now, given the facts, there is only one responsible thing for USDA to do. Go back to the field. Supervise new surveys. Collect data for at least one year. Do it right. To do anything less would be to jeopardize the entire US plant protection system.