



Export Shipments: What's Going Bump in the Night

December 10, 2015





**Julie Adams,
Almond Board**

Speakers

Julie Adams, Almond Board (Moderator)

Beth Van Meter, Almond Board

Matt Lantz, Bryant Christie Inc.



Agenda

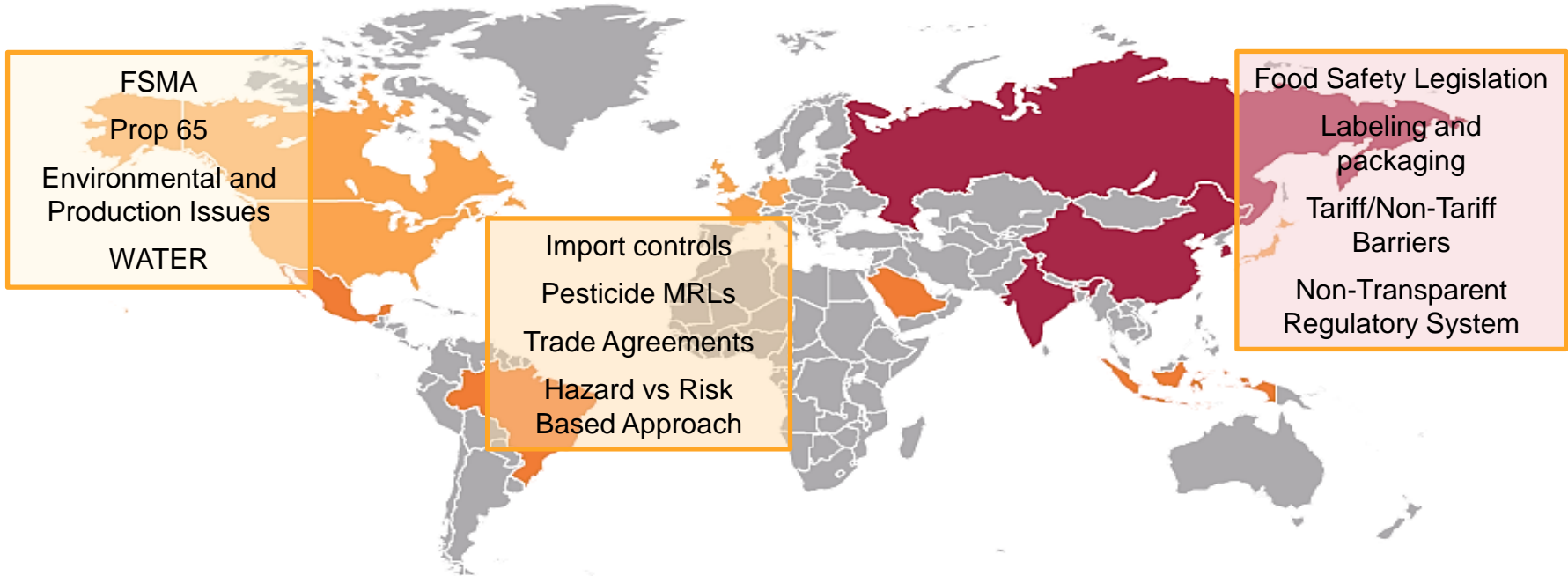
- Worldwide Overview
- European Union
- India
- China
- West Coast Ports
- MRL's
- What's in Store for 2016
- Q&A



A close-up photograph of almond buds on a branch, showing the green, fuzzy texture of the buds and the surrounding green leaves. The background is blurred, suggesting an outdoor orchard setting.

Worldwide Overview

Export or Domestic: involves Addressing Many Issues.....



FSMA
Prop 65
Environmental and
Production Issues
WATER

Import controls
Pesticide MRLs
Trade Agreements
Hazard vs Risk
Based Approach

Food Safety Legislation
Labeling and
packaging
Tariff/Non-Tariff
Barriers
Non-Transparent
Regulatory System

- Established markets: U.S., Canada, UK, France, Germany, Japan
- Emerging markets: China, India, South Korea, Russia
- Exploratory markets: Brazil, Mexico, Middle East, Indonesia

And it keeps getting more complex.....

- Some issues just won't go away....
- Engagement, relationships are fundamentally essential
- Getting the facts – *all* the facts....
- Balancing urgency
- Priorities are always changing

Row Labels	Max of Last Updated	Max of Date of Action	P
Algeria			
Algeria Port Issues	10/21/2013	3/1/2009	
Australia			
MRL Reduction on Telbuzosazole	10/15/2015	10/15/2015	
Bosnia and Herzegovina			
PEC (Transitioned from VASP)	12/02/2013	8/23/2013	
Chile			
Chile Fungation Requirement	10/02/2009	10/25/2007	
China			
China Afla Legislation	1/11/2011	10/8/2010	
China Customs Requires Pesticide Info	12/15/2009	10/6/2008	
China Customs Valuation	12/15/2009	6/16/2008	
China Food Safety Law	12/11/2009	5/3/2009	
China Nut Standards	9/22/2011	9/15/2011	
China Pathogen Testing	12/15/2009	9/17/2007	
China Port Issues	10/21/2015	10/21/2015	
China PV Requirements	12/15/2009	7/16/2008	
China Tariff Differential	12/15/2009	11/12/2006	
Colombia			
Colombia Certificate of Free Sale	8/16/2013	8/25/2013	
EU			
Country of Origin Labeling	3/16/2010	2/6/2010	
Endocrine Disruptors	10/13/2013	12/15/2014	
EU Fosetyl-Al and Phosphonic Acid	2/4/2014	2/4/2014	
EU PEC Program	10/21/2015	10/21/2015	
EU Pesticide Regulation	12/16/2009	6/19/2008	
EU Rapid Alerts	12/13/2009	11/30/2006	
EU Tariff Code for Almonds	10/21/2015	3/14/2006	
Germany			
Germany PEC (Transitioned from VASP)	5/27/2012	3/23/2012	
Germany Port Issues	10/21/2015	8/1/2009	
Greece			
Greece Port Issues	10/21/2015	7/1/2009	
India			
India Food Safety Legislation	2/4/2010	1/22/2010	
India Fungation Requirement	1/28/2011	1/1/2004	
India GST	8/10/2011	8/10/2011	
India Labeling Regulation	3/21/2014	3/21/2014	
India Pesticides	8/5/2011	8/5/2011	
India Port Issues	10/21/2015	8/1/2009	
India Prevention of Food Adulteration PFA Rules	3/10/2011	8/10/2009	
Japan			
Japan Aflatoxin	10/13/2015	8/1/2007	
Japan MRL Violation	10/26/2015	11/14/2011	
Korea			
Korea Positive MRL List	10/21/2015	10/21/2015	
Korea Regulatory Consulting	1/24/2013	1/24/2013	
Latvia			
Latvia Port Issues	10/21/2015	5/1/2009	
Mexico			
Mexico Fat Tax	12/18/2013	11/16/2013	
Norway			
Norway Port Issues	10/21/2015	5/1/2009	
Poland			
Poland PEC Program (Transitioned from VASP)	3/8/2013	2/26/2013	
Russia			
Russia Port Issues	10/21/2015	7/1/2009	
Spain			
Spain Port Issues	10/21/2015	8/1/2009	
Switzerland			
PEC for Switzerland	10/21/2015	10/21/2015	
Switzerland Port Issues	10/21/2015	7/1/2009	
Taiwan			
Taiwan MRLs	12/2/2009	1/17/2008	
Turkey			
Turkey Import Duties	3/20/2011	3/20/2011	
Turkey Port Issues	10/21/2015	10/21/2015	
U.S.			
U.S. Aflatoxin and Fung	12/2/2009	8/16/2007	
U.S. GMO	10/21/2015	10/21/2015	
U.S. Green Almonds	5/18/2015	5/2/2014	
U.S. Natural Labeling	1/22/2014	3/28/2014	
U.S. New Conservation Compliance Requirements for Crop Insurance	12/17/2015	12/17/2015	
U.S. Phosphine Gas on Restricted Materials List	12/2/2009	6/26/2008	
UAE			
UAE Port Act Infrusions	5/19/2013	5/18/2013	
Worldwide			
Acrylamide	3/12/2010	11/28/2007	
CODEx	10/21/2015	10/21/2015	
TPP	10/21/2015	10/21/2015	
Trade Issues	10/21/2015	10/21/2015	
YTP	10/21/2015	10/21/2015	

And it keeps getting more complex.....

Row Labels	Max of Last Updated	Max of Date of Action
Algeria		
Algeria Port Issues	10/21/2015	3/1/2009
Australia		
MRL Reduction on Tebuconazole	10/15/2015	10/15/2015
Bosnia and Herzegovina		
PEC (Transitioned from VASP)	12/9/2015	8/25/2013
China		
China Fumigation Requirement	10/9/2009	10/25/2007
China		
China Alfa Legislation	1/11/2011	10/8/2010
China Customs Requires Pesticide Info	12/15/2009	10/6/2008
China Customs Valuation	12/15/2009	6/16/2008
China Food Safety Law	12/21/2009	5/3/2009
China Nut Standards	10/22/2015	8/15/2013
China Pathogen Testing	12/15/2009	9/17/2007
China Port Issues	10/21/2015	10/21/2015
China PV Requirements	12/15/2009	7/16/2008
	12/15/2009	11/12/2006
	8/16/2013	8/25/2013
	3/16/2010	2/4/2010
	10/15/2015	12/15/2014
	2/4/2014	2/4/2014
	10/21/2015	10/21/2015
	12/16/2009	8/19/2008
	12/21/2009	11/10/2006
	10/21/2015	3/14/2006
	5/2/2012	3/23/2012
	10/21/2015	8/1/2009
	10/21/2015	7/1/2009
	2/4/2010	1/22/2010
	1/28/2011	1/28/2008
	8/10/2013	8/10/2013
	3/21/2014	3/21/2014
	6/5/2011	6/5/2011
	10/21/2015	8/1/2009
	3/10/2011	8/10/2009
	10/18/2015	8/1/2007
	10/26/2015	11/14/2011
	10/21/2015	10/21/2015
	1/24/2013	1/24/2013
	10/21/2015	5/1/2009
	12/15/2013	11/16/2013
	10/21/2015	5/1/2009
	3/9/2013	2/26/2013
	10/21/2015	7/1/2009
	10/21/2015	8/1/2009
	10/21/2015	10/21/2015
	10/21/2015	7/1/2009
	12/22/2009	1/17/2008
	3/10/2011	3/10/2011
	10/21/2015	10/21/2015
	12/22/2009	8/14/2007
	10/21/2015	10/21/2015
	5/18/2015	5/2/2014
	1/28/2014	3/23/2014
	2/17/2015	2/17/2015
	12/22/2009	6/16/2008
	5/18/2015	5/18/2015


Critical Priority Analysis

Impact (Medium → High)	Priority Rating 2	Priority Rating 1	Priority Rating 4	Priority Rating 3
	<ul style="list-style-type: none"> Endocrine Disruptors EU PEC Program West Coast Ports Proposition 65 India Labeling Requirements EU Mercury MRL changes 	<ul style="list-style-type: none"> EU Fosetyl-AL and Phosphonic Acid 	<ul style="list-style-type: none"> India Fumigation Requirements India Food Safety Legislation Japan Aflatoxin Korea Regulatory Consulting Latvia Port Issues Poland PEC Program (Transition from VASP) TPP China Nut Standards China PV Requirements China Tariff Differential Colombia Certificate of Free Sale Country of Origin Labeling EU Pesticide Regulation EU Tariff Code for Blanched Almonds Germany PEC (Transition from VASP) China Port Issues India Port Issues India GST India Players 	<ul style="list-style-type: none"> Australia MRL Reduction on Tebuconazole Rapid Alerts BAC/IDDAC Germany Port Issues Korea MRL List Mexico Fat Tax Norway Port Issues US GMO US New Conservation Compliance Requirements for Crop Insurance CODEX Dubai Port Ant Intrusions China Food Safety Law TTIP

Engagement (Medium → High)

Priority 1	Priority 1 issues are issues in which the most time is devoted to. These issues, if not managed immediately can create trade barrier to almonds.
Priority 2	Priority 2 issues are issues in which a high amount of time are devoted to. These issues have the potential of becoming priority 1 issues but are being managed to prevent escalation.
Priority 3	Priority 3 issues are issues which need to be managed but have not completely bloomed into high priority issues. Issues can be managed over a longer period of time.
Priority 4	Priority 4 issues are issues which the least amount of time is given. Many of these issues have been resolved and the ABC is monitoring in order to prevent additional escalation.

Acrylamide	3/12/2010	12/28/2007
CODEX	10/21/2015	10/21/2015
TPP	10/21/2015	10/21/2015
Trade Issues	10/21/2015	10/21/2015
TTIP	10/21/2015	10/21/2015

A close-up photograph of almond buds on a branch, showing the green, fuzzy texture of the buds and the surrounding green leaves. The background is blurred, suggesting an outdoor setting.

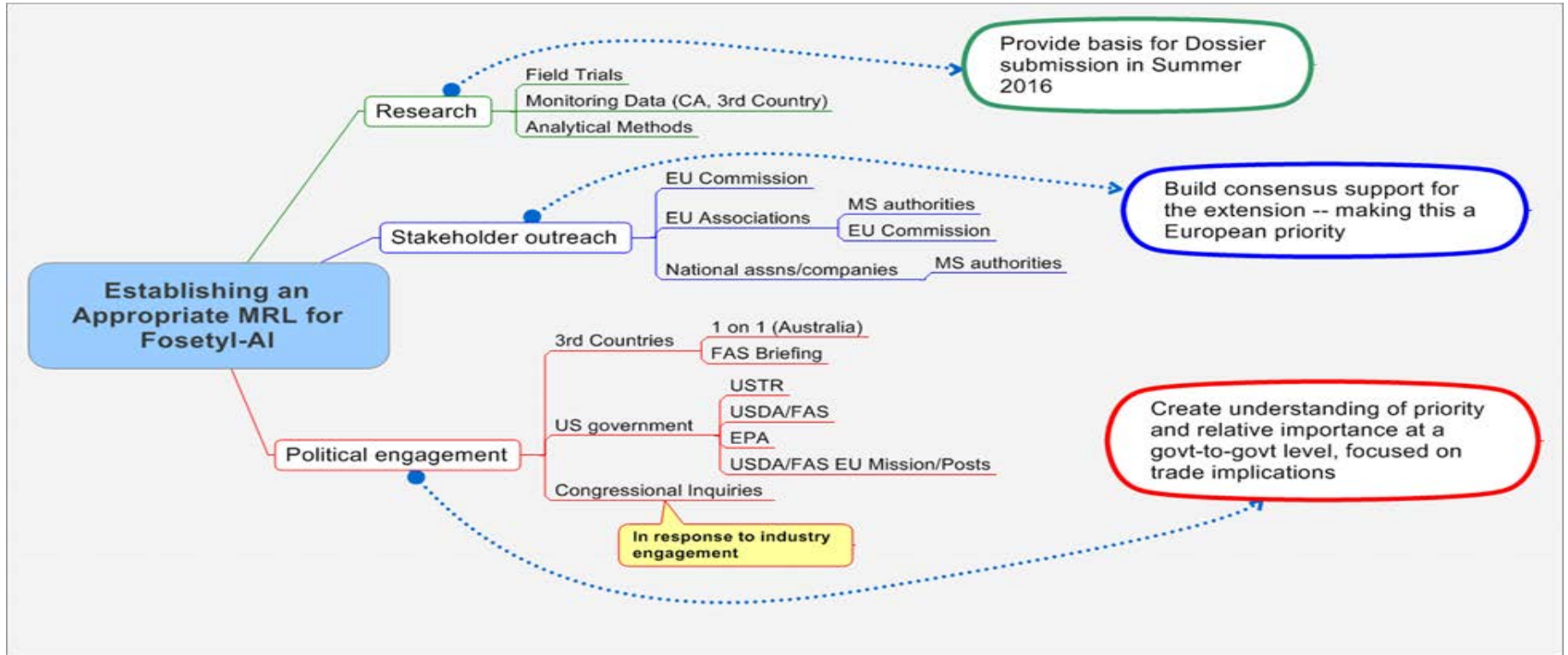
European Union

How did the Fosetyl Issue Come Up?

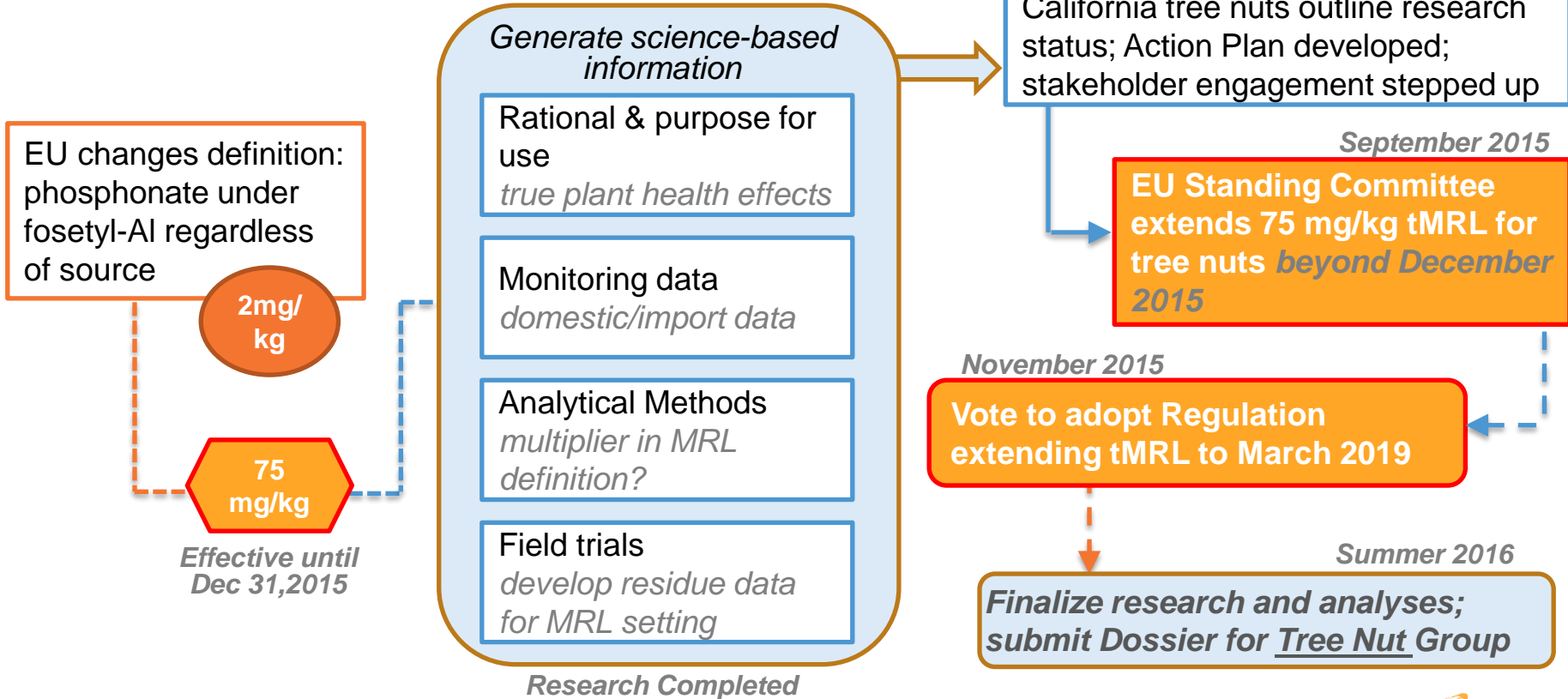
- EU changed the designation of phosphite from both a fertilizer and pesticide, to only a pesticide, in late 2013
- A Maximum Residue Limit (MRL) for phosphite-containing products was not established
 - Any residues were included under the MRL for fosetyl-Al (which is not approved for use in the U.S. on bearing tree nuts!
- EU set a temporary MRL of 75 ppm for tree nuts and several other crops in 2014
- It took *a lot of time and effort* to find a solution.....

**The temporary
MRL
for tree nuts only
was extended to
March 1, 2019**

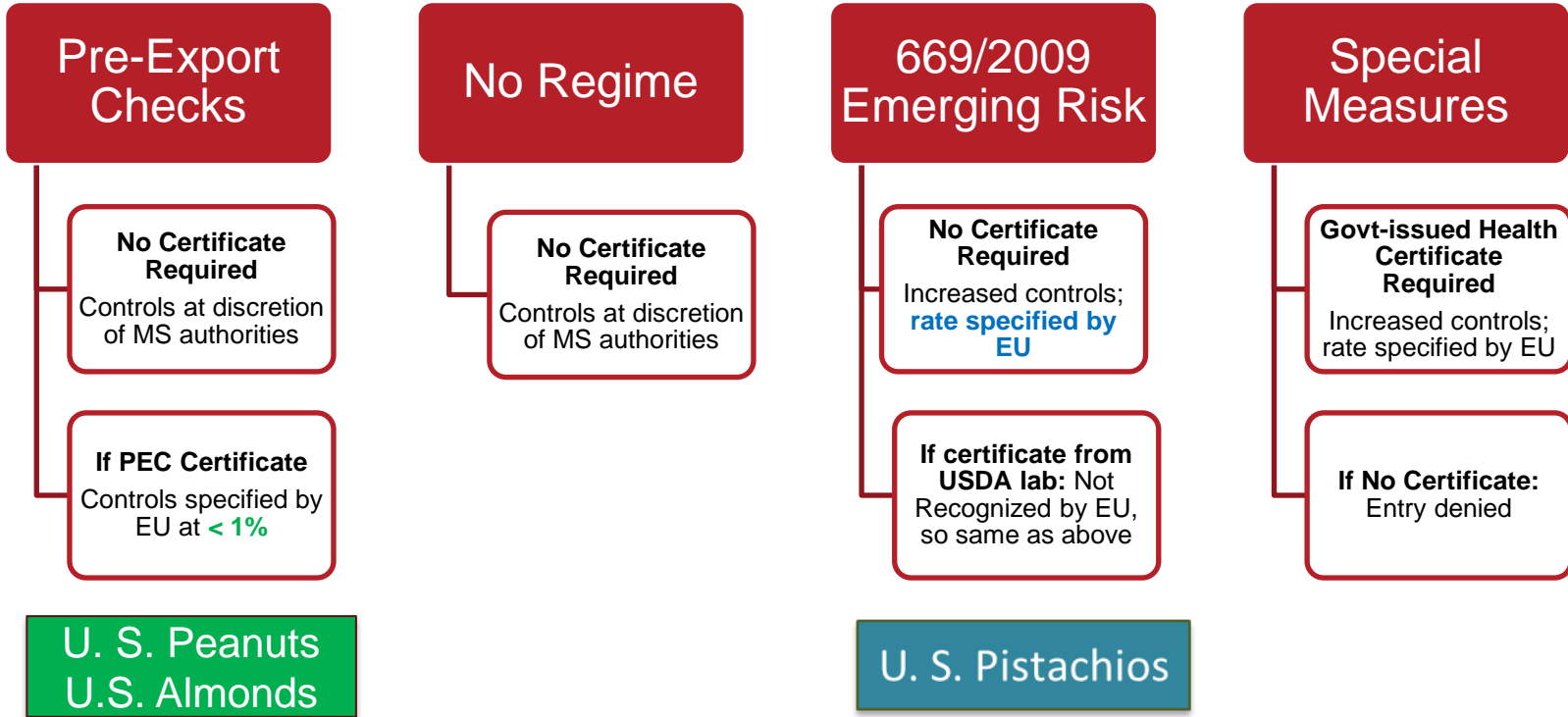
Leveraging Multiple Approaches.....



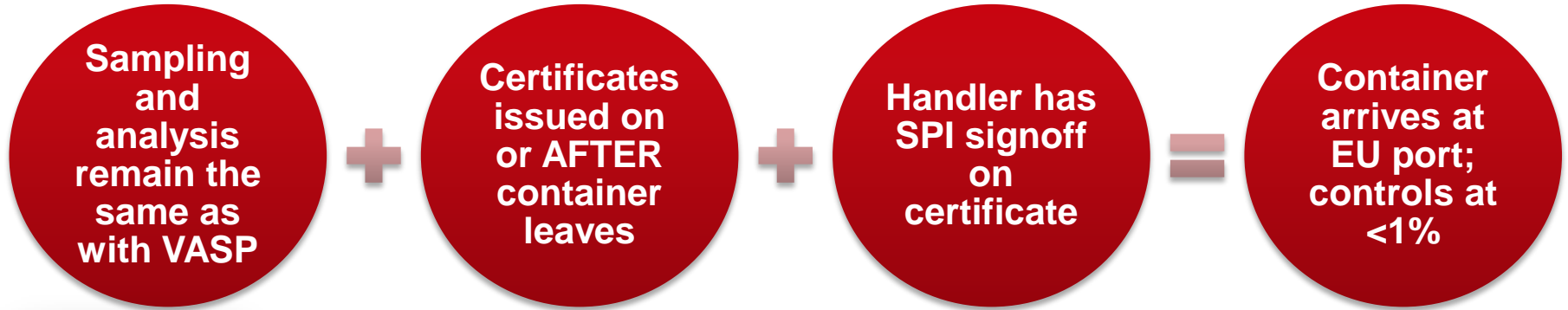
Phosphonate (Fosetyl-AI) Process



EU Import Authorities have Several Options for Controls



Why Pre-Export Checks Matters....



Official Journal of the Commission

Job Range & Address

SPECIAL NOTE: Almond Board of California Pre-Export Certification (PEC) Program

Date Analyzed

TEST METHOD	DATE
...	...

Without PEC cert, container will not be rejected, but may be subject to additional controls

Pre-Export Checks

Top 5 PEC Challenges

1. Missing the 7 day deadline for USDA to sign
2. Entering the wrong Lot ID
3. Entering incorrect container number
4. Entering/changing wrong packaging information
5. No consignee int'l contact information



Commercial Reality: Changes to Consignee, Person Responsible

- The customer is not always known when consignment ships
- Handler selling through a trader may not have the customer contact information
- Integrity of the certificate **does not change** if the customer changes

15.1.2008 EN Official Journal of the European Union L 11/15

ANNEX

COUNTRY:

Part 1: Details of dispatched consignment	I.1. Consignor Name Address Tel. No	I.2. Certificate reference number I.2.a
		I.3. Central Competent Authority
		I.4. Local Competent Authority
	I.5. Consignee Name Address Postal Code Tel. No	I.6. Person responsible for the consignment in EU Name Address Postal Code Tel. No
	I.7. Country of origin ISO code I.8.	I.9. Country of destination ISO code I.10.
	I.11. Place of origin Name Address	I.12.
	I.13. Place of loading	I.14. Date of departure
	I.15. Means of transport Aeroplane <input type="checkbox"/> Ship <input type="checkbox"/> Railway wagon <input type="checkbox"/> Road vehicle <input type="checkbox"/> Other <input type="checkbox"/>	I.16. Point of import in EU
	Identification	I.17.

Possible Solution – Updating Pertinent Commercial Data

- A uniform update of pertinent details
- Letter *issued by shipper (handler, trader, broker)*
- Downloaded from ABC website – outside PEC system
- Would retain customer confidentiality for shippers
- Provides accurate importer information that authorities require
- Next Steps:
 - Review with European Commission authorities

BE SURE YOUR LETTER HEAD IS ON THIS LETTER

Month XX, 20XX

ADDRESSEES NAME
ADDRESSEES TITLE
ADDRESSEES AGENCY

This letter is in response to the recent shipment of almonds to (insert country name here). (insert company name here) is submitting this addendum to the original Pre-Export Check (PEC) certificate documentation for the following consignments:

1. BATCHLOT #
2. BATCHLOT #
3. BATCHLOT #

Due to the nature of almond trading the Consignee (box 1.5), Person Responsible (box 1.6), Country of Destination (box 1.9) and Point of import in EU (box 1.16) may not be known at the time the United States Department of Agriculture (USDA) signs the PEC certificate. Annex 1 of the PEC certification is for commercial logistic purposes only and does not affect the validity of the technical information provided by the USDA laboratory on the Aflatoxin certificate or Annex 2. Please accept the corrected information below:

Addendum to Annex 1 of Pre Export Check (PEC) Certificate			
1.5 Consignee		1.6 Person responsible for the consignment in EU	
Name		Name	
Address		Address	
Postal Code	Tel. No	Postal Code	Tel. No
1.7 Country of origin	ISO code	1.9 Country of destination	ISO code
USA	US		
		1.16 Point of import in EU	

Please feel free to contact COMPANY NAME at PHONE NUMBER.

Many thanks for your assistance.

Sincerely,

YOUR NAME HERE
YOUR TITLE HERE



India

What's the regulatory picture for Food?

- Government focus on corruption, bureaucracy
- Economic growth priority: **Make in India**
- Rollout of food safety laws: questions over interpretation, implementation
- More FSSAI regulations coming:
 - Nutrition labeling, claims, product approvals
 - Product standards outdated
- Food safety confidence is key
 - Consumers don't trust information
 - Innovation, food development paralyzed by procedures
- CEO transferred.... New FSSAI Chairman has assumed both roles

fssai



Maggi noodles pulled from India stores over reports of high lead levels

NEW DELHI: Singapore's food regulator declared Maggi noodles imported from India to be free from health risks, bringing some respite to Nestle. The manufacturer had been ordered to withdraw the locally made product from shelves in India because of excessive lead content and mislabeling.

India: FSSAI Scraps Food Product Approval Following Supreme Court Ruling

August 31, 2015 | [Attaché Reports \(GAIN\)](#)

Status of Labeling: Still Clear as Mud.....

- Bulk, wholesale, retail....
- Labeling requirements still under review/consideration
 - Intended use versus pack size
- Right now, key elements on each carton/sack
 - Name of food
 - Manufacturer/packer name and address
 - Pack date
 - **Importer name and address**
 - **Importer FSSAI license and logo (effective Dec 31, 2015)**
- No more veg logo?

fssai

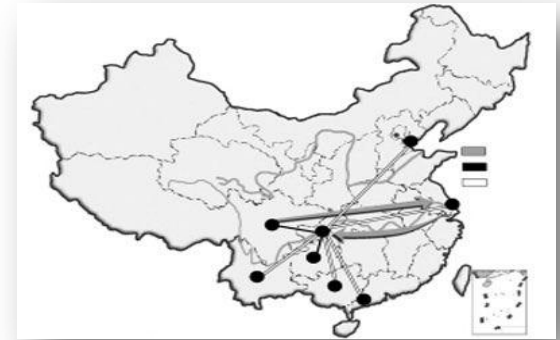




China

China Regulatory Environment

- New Food Safety Act – regulate industries, protect consumers
- Responding to problems at the root of public discontent – *especially* food safety
- Advertising Law revised for the first time in 20 years – again in response to consumer complaints
- Decentralization – potential for interpretation differences
- AQSIQ looking to streamline operations
 - Build an effective, fair and transparent customs clearance environment
 - Decentralizing inspection control to local CIQs
 - Approach to supervision and control reminiscent of EU



National Integrated Customs
Clearance Prospect

Opportunity for a
“green channel”
approach??

China Shifting Mindset to “Governance”

- Requirements not unlike FSMA
- Focus on legal sources of products, traceability, invoicing systems
- Retailer and distributors also responsible for ensuring accuracy of documents, traceability
- Authorities recognize regulations need to be *feasible and practical*
- Food exporter filing system updated for traceability purposes
- Filing ≠ registration/licensing – which is not required for nuts

USDA Foreign Agricultural Service
GAIN Report
Global Agricultural Information Network

THIS REPORT CONTAINS ASSESSMENTS OF COMMODITY AND TRADE ISSUES MADE BY USDA STAFF AND NOT NECESSARILY STATEMENTS OF OFFICIAL U.S. GOVERNMENT POLICY

Voluntary . Public

Date: 9/22/2015
GAIN Report Number: CH15033

China - Peoples Republic of

Post: Beijing
China Announces Upgrade to its Foreign Food Importer and Exporter Registration System

Report Categories:
FAIRS Subject Report

Approved By:
Jennifer Clever
Prepared By:
Jennifer Clever, Ma Jie

Report Highlights:
On August 17, 2015, China's General Administration of Quality Supervision, Inspection and Quarantine (AQSIQ) announced that starting October 1, 2015, AQSIQ will adopt an upgraded registration filing management system. This upgrades AQSIQ's Foreign Food Importer and Exporter Filing System adopted back in October 2012. Chinese importers and foreign exporters can log into the system at the following website <http://ire.eciq.cn> and submit their registration information. This report contains an unofficial translation of the public notice.



West Coast Ports

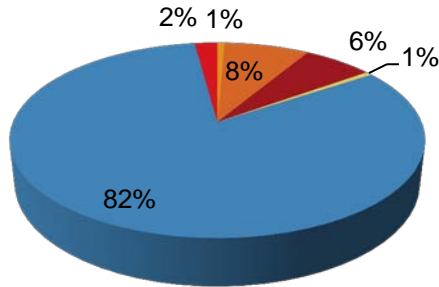
Port Slowdown Background

- International Longshoreman and Warehouse Union (ILWU), and Pacific Maritime Association (PMA)
 - ILWU: represents approximately 42,000 members
 - PMA: represents 72 shipping lines and terminal operator companies.
- 30 Ports located in the California, Oregon and Washington
- New 5 year contract could not be reached causing months of negotiations. Port Slowdowns (not strike) started to occur in November 2014 when a contract could not be reached.
 - ILWU and PMA previous contract expired on 1 July 2014
 - Negotiations began around May 2014
 - Port operations continued though no contract was in place
 - Tentative contract agreement was reached on 20 February 2015
 - Contract was finalized on 22 May 2015
 - The contract is retroactive from 1 July 2014
 - **New contract expires 30 June 2019**



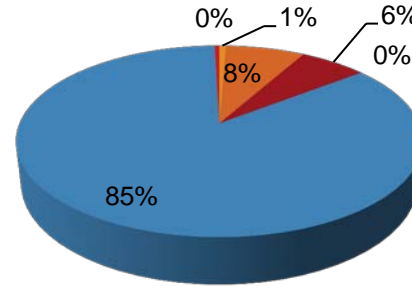
December 2013/2014

December 2013



- Houston, TX (Port)
- Long Beach, CA (Port)
- Los Angeles, CA (Port)
- New York, NY (Port)
- Oakland, CA (Port)
- All Others

December 2014

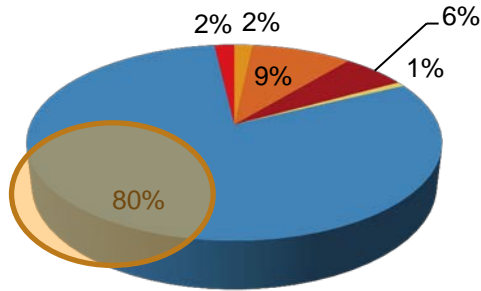


- Houston, TX (Port)
- Long Beach, CA (Port)
- Los Angeles, CA (Port)
- New York, NY (Port)
- Oakland, CA (Port)
- All Others

December (2014/2013) Year over Year	Kilos	Percentage (Incrs/Dcrs)
Total Shipments	(7,982,781)	-13.6%
Oakland, CA (Port)	(5,435,015)	-11.2%
Houston, TX (Port)	(85,603)	-21.4%
Long Beach, CA (Port)	(860,120)	-18.4%
Los Angeles, CA (Port)	(580,737)	-15.3%
New York, NY (Port)	(346,827)	-100.0%
All Other	(674,479)	-75.6%

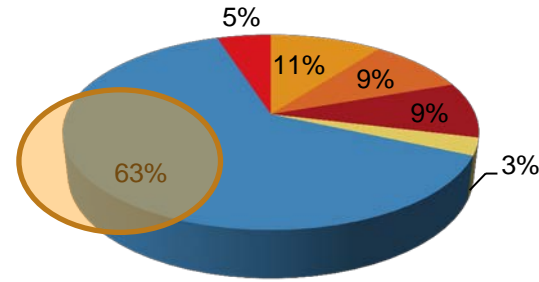
March 2014/2015

March 2014



- Houston, TX (Port)
- Long Beach, CA (Port)
- Los Angeles, CA (Port)
- New York, NY (Port)
- Oakland, CA (Port)
- All Others

March 2015



- Houston, TX (Port)
- Long Beach, CA (Port)
- Los Angeles, CA (Port)
- New York, NY (Port)
- Oakland, CA (Port)
- All Others

March (2015/2014) Year over Year	Kilos	Percentage (Incr/Decr)
Total Shipments	12,403,611	23.6%
Oakland, CA (Port)	(226,055)	-0.5%
Houston, TX (Port)	6,046,817	679.8%
Long Beach, CA (Port)	1,198,262	24.2%
Los Angeles, CA (Port)	3,025,746	96.4%
New York, NY (Port)	1,513,385	382.7%
All Other	845,456	144.1%

March 2015
was the
height of
tensions and
negotiations

Proposed Legislation

Senate

- Port Transportation Act (S. 1298/Thune, SD)
- The Protecting Orderly and Responsible Transit of Shipments Act of 2015 (PORTS Act) (S. 1519, Gardner)
- **PLUS Act:** The Preventing Labor Union Slowdowns Act of 2015 (S. 1630, Risch, ID)
- The Comprehensive Transportation and Consumer Protection Act of 2015 (S. 1732/Thune, SD)

House of Representatives

- Fixing America's Surface Transportation Act (H. R. 22)
- The Protecting Orderly and Responsible Transit of Shipments Act of 2015 (PORTS Act) (HR 3433)
- **ECONOMICS Act:** The Ensuring Continued Operations and No Other Major Incidents, Closures, or Slowdowns (H.R. 3932/ Newhouse, WA; Schrader, OR)

**Surface Transportation Bill Released
December 1, 2015**

Looking to the Future

- Current ILWU/PMA contract **expires 30 June 2019**
- ABC is committed to researching the facts
 - ABC West Coast Port Slowdown Survey set to shippers
 - Shipping Data
 - BOL Data
 - Ensuring the facts are made public
- Prepare for the next round early
 - Have a backup port ready for shipments in early 2019
 - Participate in an upcoming AgTC workshop:
 - Fresno, Double Tree by Hilton, Fresno Convention Center, February 24, 2016
 - Sacramento, The Dante Club, February 25, 2016





Maximum Residue Limits (MRL's)

MRL Basics:

- Maximum Residue Levels (Limits)
- Detected residues should meet import country's MRL
- Residues should not be detected if country has not established an MRL
- MRL are not a food safety standard
- **MRLs ARE NOT HARMONIZED**



dreamstime.com

Examples of Bump in the Night MRLs:

Active Ingredient	Trade Name	Usage on CA Almonds	Survey Results 2006-2013	U.S. MRL	Markets with Restrictive MRLs
Chlorpyrifos	Lorsban	240,687 acres (2013)	0.01-0.16	0.2 0.1 facility use	Australia (0.05); EU (0.05); Hong Kong (0.05)
Dichlorvos	---	44,000 lbs. (2012)	0.01-0.32	0.5 postharvest	No MRLs in India, Taiwan, Canada (0.1 default). EU (0.01); Japan (0.2)
Glyphosate	Roundup/ Touchdown	1,522,890 acres (2013)	0.02-0.15	1	Canada (0.1); EU (0.1)
Iprodione	Rovral	296,412 acres (2013)	0.01-0.17	0.3	EU (0.2); India (0.2); Taiwan (0.2)
Methoxyfenozide	Intrepid	448,808 acres (2013)	0.01-0.03	0.1	EU (0.02)
Paraquat dichloride	Cyclone/ Herbiquat	341,636 acres (2013)	0.02-0.04	0.05	EU (0.02)

How to Minimize MRLs Issues When Exporting

1. KNOW THE MRLs

- GlobalMRL.com
- All International MRLs
- Updated Daily



The screenshot shows the homepage of the Global MRL Database. At the top left is the logo for Global MRL Database, a service of Bryant Christie Inc. At the top right, there are links for 'Support / Feedback' and a 'LOGIN' button. Below the header is a navigation bar with links for 'OVERVIEW', 'SUBSCRIPTIONS', 'CONNECT', and 'CONTACT US'. The main heading is 'GLOBAL MRLS' in large blue letters. Below this, a paragraph states: 'Updated daily, **globalmrl.com** will keep you informed of pesticide Maximum Residue Level (MRL) tolerances for markets around the world.' A 'Note' follows: 'Existing MRLDatabase.com users do not need to re-register. Simply select the "login now" button below and enter your same login credentials.' There are two buttons: a blue 'LOGIN NOW »' button and a yellow 'SUBSCRIBE »' button. The background of the page is a photograph of a green agricultural field with mountains in the distance. At the bottom, there are three icons with corresponding text: a globe icon for 'Pesticide Tolerances » General & default MRL', a leaf icon for 'Intuitive MRL Searches » 100+ markets', and a network icon for 'Relevant Information » Exemptions & regulation notes'.

How to Minimize MRLs Issues When Exporting

2. Early Consideration and Pre-testing

- Consider potential MRL issues before season and before crop is treated
- Consider lab testing prior to export, although this adds to expense



How to Minimize MRLs Issues When Exporting

3. Communication with Customers

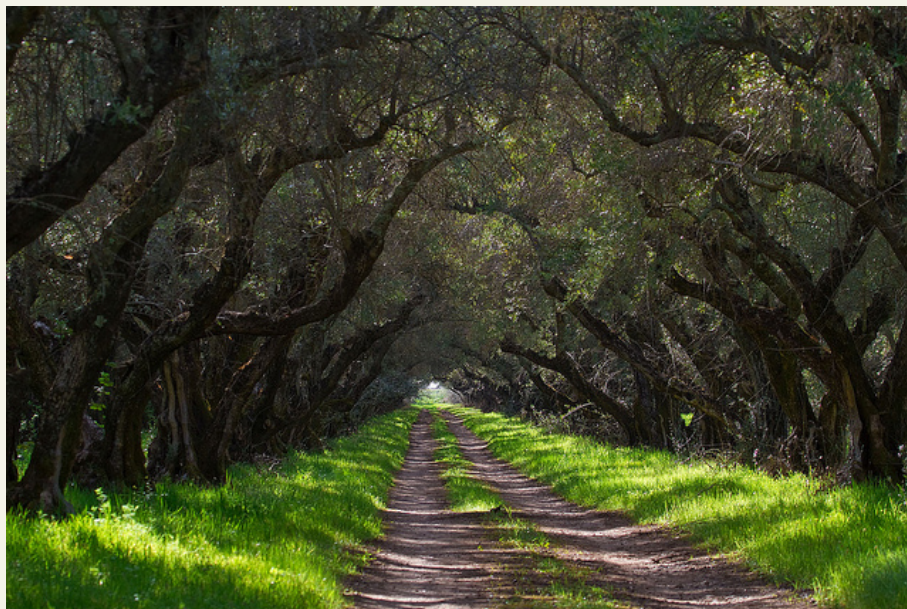
- Speak to customers about MRLs prior to export
- Have a company MRL plan to address customer questions
- Be aware of private sector standards



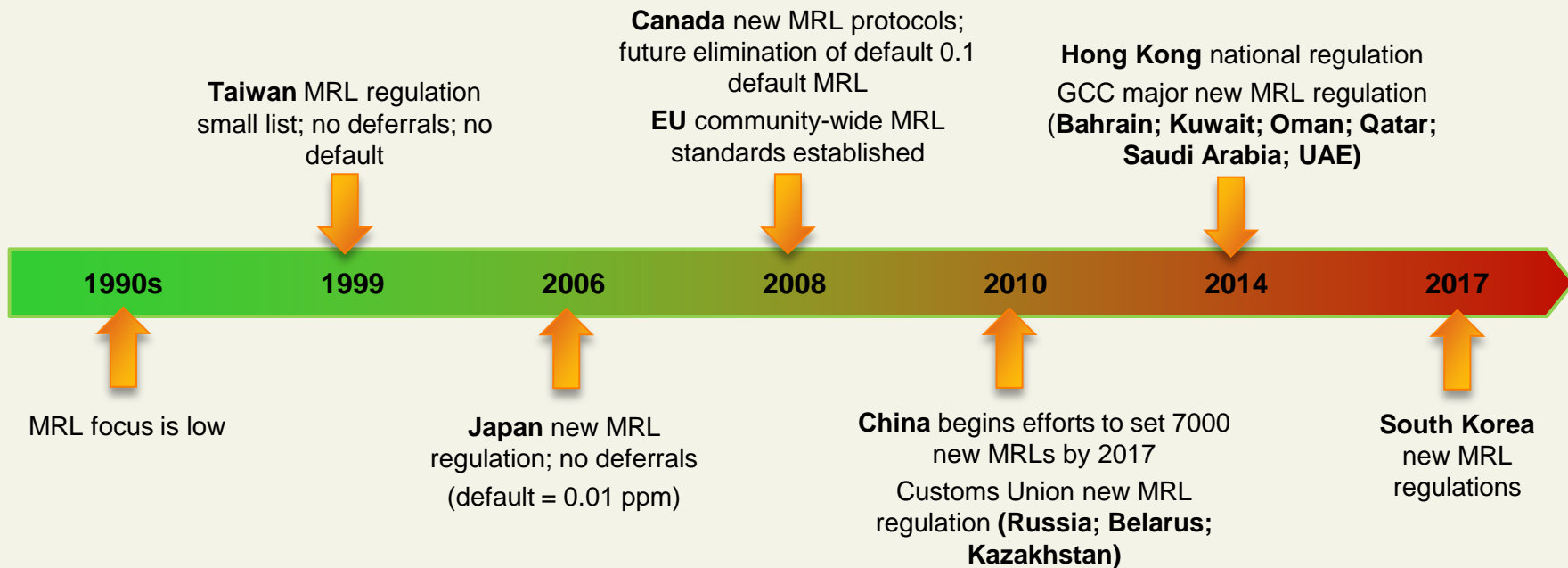
How to Minimize MRLs Issues When Exporting

4. Seek Needed MRLs Proactively

- Work with ABC to seek needed MRLs in key markets



And the Issues are Coming Faster.....



Other markets with new MRL regulations pending: **Mexico; Morocco; Peru, Dominican Republic**

A close-up photograph of several green almonds on a branch, surrounded by vibrant green leaves. The almonds are in various stages of growth, some appearing more rounded and others more elongated. The background is softly blurred, showing more of the tree and a hint of a person in the distance.

What's in Store for 2016

What's in Store for 2016

- Roll out of FSMA – FDA “on the farm”
- Pesticides will continue to be a BIG concern
- Sustainability and documentation of practices
- Import controls and certification
- Opportunity for demonstrating equivalence of practices
- Need for partnerships –alliances with industry stakeholders *and* government authorities
- Need to be flexible and responsive – ***we're here to help you!***

