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November 20, 2025

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USITC Investigation Nos. 701-TA-778 and 731-TA-1764  
(Preliminary)

**PUBLIC DOCUMENT**

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The Honorable Lisa R. Barton  
Secretary  
U.S. International Trade Commission  
500 E Street, S.W., Room 112  
Washington, DC 20436

**Re: Fresh Mushrooms from Canada – Petitioners’ Submission of Witness Testimonies**


Dear Secretary Barton:

On behalf of the Fresh Mushrooms Fair Trade Coalition and its individual members (collectively, “Petitioners”), and pursuant to the Commission’s scheduling notice published in the Federal Register, 90 Fed. Reg. 45,245 (Sept. 19, 2025) and the Commission’s subsequent modification of the schedule for its preliminary proceedings as a result of the lapse in appropriations (90 Fed. Reg. 52,094 (Nov. 19, 2025)), we hereby submit Petitioners’ witness testimonies for the Commission’s preliminary conference on November 21, 2025. All written statements are signed by the relevant witness and are declared under penalty of perjury. This submission has been served in accordance with the attached certificate of service.

\* \* \*

Please contact the undersigned with any questions regarding this submission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "John M. Herrmann". The signature is fluid and cursive, with a long horizontal stroke at the end.

JOHN M. HERRMANN  
PAUL C. ROSENTHAL  
JOSHUA R. MOREY

Counsel to Petitioners

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**CERTIFICATION**

In accordance with section 207.3(a) of the Commission's regulations, 19 C.F.R. § 207.3(a), I, John M. Herrmann, hereby certify on November 20, 2025, that the information contained in this document is accurate and complete to the best of my knowledge.

This certification is made in accordance with 28 U.S.C. § 1746. I declare under penalty of perjury of the laws of the United States of America that the foregoing statements are true and correct to the best of my information and belief.

  
\_\_\_\_\_  
John M. Herrmann

**Testimony of David Carroll**  
**Fresh Mushrooms from Canada**  
**U.S. International Trade Commission**  
**Preliminary Investigation**  
**November 21, 2025**

Good morning. My name is Dave Carroll, and I am the former president of Giorgi Mushroom Company and Giorgio Fresh Company, where I have been employed for nearly 40 years. Both Giorgi Mushroom and Giorgio Fresh are indirect, wholly-owned subsidiaries of Giorgi Global Holdings, a third-generation family-owned business that grows, packs, and processes fresh *Agaricus* mushrooms in the United States. Founded in 1928 and incorporated in 1960, Giorgi Mushroom is now the largest single-location mushroom farm in North America, with more than 450 growing rooms spread throughout Berks County, Pennsylvania. I began working at Giorgi Mushroom in 1986, became general manager in 1988, and rose to become president in 1989. In our early years, we focused on cultivating mushrooms for canning and jarring by our processing division. In 1994, however, growing consumer demand for fresh produce led us to enter the fresh market – and, in 2001, to establish Giorgio Fresh, a subsidiary of Giorgi Mushroom that packs and distributes fresh *Agaricus* mushrooms. Today, we serve the entire U.S. market, including retail customers, food processors, and food service distributors.

Before discussing the negative impact that low-priced Canadian imports have had on our operations, I would like to provide you with some background information on the product. As you heard earlier this morning, the scope of these investigations covers all fresh mushrooms of the genus *Agaricus*, including – most prominently – those of the species *Agaricus bisporus*. This species encompasses most of the mushroom varieties in your local grocery store, such as white buttons, criminis, baby bellas, and portabellas. Although these mushrooms may differ in visual appearance and flavor profile, their physical characteristics are determined by the use of various strains of the same species and by maturity at the time

of harvest. A crimini mushroom is simply a brown strain of *Agaricus bisporus*, and a portabella mushroom is nothing more than a mature crimini mushroom.

The production process for fresh *Agaricus* mushrooms begins with compost, a substrate that provides the nutrients for the crop and facilitates growth. While we are vertically integrated, and manufacture our own compost in house, some U.S. growers purchase pre-made compost from third parties. In either case, compost is formed by mixing and wetting ingredients such as hay, straw, poultry litter, gypsum, and corn stover with loaders and industrial turners. The compost is allowed to ferment for up to three weeks. This process is known as Phase I composting. The Phase I compost is filled into a tunnel, a structure with an aerated floor where the compost is pasteurized to kill any pathogens and pests, and is conditioned by the controlled growth of thermophiles to eliminate ammonia and make the compost selective for the growth of *Agaricus* mycelium. This process is known as Phase II composting. The compost is then cooled and removed from the tunnel. Spawn, the equivalent of mushroom seed and a protein rich supplement are added as the tunnel is being emptied. The compost is then hauled to the growing rooms and layered into horizontal racks. Growing rooms are specialized structures designed to control airflow, carbon dioxide, temperature, and humidity.

The mycelium from the spawn is allowed to colonize the compost for about two weeks. This phase is known as the Spawn Run or Phase III. At this point, a second layer of moist material known as casing soil, which has also been inoculated with mycelium, is applied. Somewhere around day four to five after casing soil is applied, the carbon dioxide in the air is lowered to initiate fruiting. Within a few days, small pins (or immature mushrooms) appear. The mushrooms are harvested about 12 days after fruiting is initiated, in recurring windows known as breaks, and shipped from the growing location to the packing location. Packers engage in quality assurance processes and food safety measures to meet customer

demands – including cleaning, washing, metal detection, and vacuum cooling. Packers may also sort, slice, and de-stem the mushrooms before shipment to the end user.

Giorgi Mushroom and Giorgio Fresh are state-of-the-art operations with decades of experience in this capital-intensive industry. We take pride in the quality of our mushrooms. We have one of the lowest product rejection rates in the business, and are consistently ranked as a top-tier supplier by our customers. Although mushroom cultivation requires meticulous planning, the vertically integrated nature of our operations provides us with the flexibility to react quickly to changes in demand. We manufacture all our own raw materials – including spawn, compost, supplements, and casing soil – and can increase supply with only a few weeks notice. When necessary, we can redirect mushrooms intended for our processing operations to the fresh market, as well as source additional volumes from contract and independent growers. As a result, we excel in on-time and in-full deliveries, and we are often called on by customers when our competitors face temporary supply shortfalls.

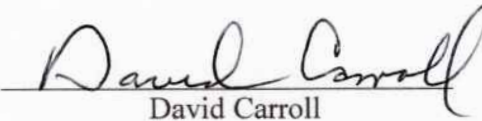
Nevertheless, we have been unable to compete with the flood of unfairly-traded Canadian imports, which are consistently offered at prices well below our own. These imports have been steadily increasing for nearly a decade, but have intensified in volume over the course of the past four years, at a time when overall demand in the U.S. market was declining. Although the first impact of the low-priced Canadian imports was lost sales and lost revenues for our packing operations, these mushrooms have also devastated our upstream growing operations. In June 2023, we were forced to shutter Donna Bella Farms – a joint venture between Giorgi Mushroom and Monterey Mushrooms, consisting of 77 growing rooms – resulting in a loss of 160 jobs. Our remaining farms have experienced recurring production cutbacks of up to 20 percent seasonally between January 2022 and June 2025, causing further reductions in our workforce. Further, we have been forced to limit purchases from both our contract growers and other

independent growers. Many independent growers have gone out of business since 2022, and will not be included in the Commission's database.

Current conditions in the U.S. market for fresh *Agaricus* mushrooms are unsustainable. As our sales quantities and production volumes have declined, both Giorgi Mushroom and Giorgio Fresh have absorbed increasing shares of our overhead costs and selling expenses. The difficulty of this situation has been magnified by our customers demanding lower prices to compete with Canadian imports. As a result, our financial condition – which has been far from healthy over the past four years – is now anemic, and we are struggling just to maintain a semblance of profitability. Without relief, we will be obliged to make additional difficult decisions that affect our operations and our workers. For the sake of our company and its dedicated employees, we urge the Commission to reach an affirmative preliminary determination in these investigations. Thank you.

**CERTIFICATION**

This statement is made in accordance with 28 U.S.C. § 1746. I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct to the best of my information and belief.

  
David Carroll

Dated: November 20, 2025

**Testimony of Bryan Shelton**  
**Fresh Mushrooms from Canada**  
**U.S. International Trade Commission**  
**Preliminary Investigation**  
**November 21, 2025**

Good morning. My name is Bryan Shelton, and I am the Vice President of Sales and Marketing for Giorgio Fresh Company (“Giorgio”), where I have been employed for three years. Prior to joining Giorgio, I held sales, marketing, and business development roles with several food companies including Pinnacle Foods, Del Monte Foods, and Kellogg for more than 20 years. My colleague Dave Carroll’s testimony has focused on the growing process and impact of Canadian mushroom imports on the growing operations of both our company and our contract and independent growers. I will discuss the impact of Canadian mushrooms on our company’s sales of fresh mushrooms.

The two most significant sales channels for fresh mushrooms are retail and food service, with a third, smaller channel being further processing operations, including our affiliated cannery. Over the past three years, Canadian mushroom imports have had a very significant impact on our ability to sell fresh mushrooms in retail and food service – the channels that are most profitable for our business.

Just six months into my tenure with the company, we lost a significant percentage of business with one of our foodservice accounts to one of our Canadian competitors due to aggressive pricing behavior. This competitor has U.S. and Canadian operations and now supplies our former customer with mushrooms from both of its operations. The fact that our former customer now sells mushrooms grown and packed in both countries demonstrates that this customer considers the products identical, regardless of country of origin. This lost sale was just

an introduction into the competitive pressures that Giorgio has faced from low-priced Canadian imports over the past few years.

Last year, a major food purchasing cooperative solicited bids for several major retailers. Some of these were our incumbent customers, and others were retailers for which we were seeking to gain new business. We bid very aggressively on this business, with prices that would have netted Giorgio low single digit profit margins, and we failed to win the business in every instance. Essentially all of the business solicited by this food cooperative was awarded to a major Canadian mushroom producer, Highline Mushrooms.

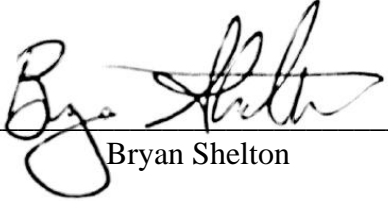
This year it has been the same story. We have made aggressive attempts to bid on existing business or new business and have lost on price in many instances. In one example, despite offering bids that were at barely above break-even profit margins for Giorgio, we were given feedback our prices were still 15 percent too high across the board. Despite lowering our prices even further, we lost this business to a Canadian competitor.

Over the past two years, in the instances that we have been awarded business, we have had to lower our prices or offer pricing that is at just above break-even levels. We cannot continue down this path. While the U.S. industry has contracted significantly in the last several years, we consistently see press reports about expansions in growing operations in Canada. Based on personal conversations with executives in the Canadian industry, we know that these expansions are focused on increasing the Canadian share of the U.S. market.

It is imperative for Giorgio and our industry that fair trade is restored, or the U.S. fresh mushrooms industry will continue to shrink and ultimately disappear. We urge the Commission to reach an affirmative preliminary determination and provide much needed relief to our industry, our company, and our employees.

**CERTIFICATION**

This statement is made in accordance with 28 U.S.C. § 1746. I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct to the best of my information and belief.



\_\_\_\_\_ Bryan Shelton

Dated: November 20, 2025

**Testimony of Pat Jurgensmeyer**  
**Fresh Mushrooms from Canada**  
**U.S. International Trade Commission**  
**Preliminary Investigation**  
**November 21, 2025**

Good morning Ms. Christ and members of the Commission staff.

My name is Pat Jurgensmeyer. I am the Chief Executive Officer of J-M Farms, LLC, a grower and packer of fresh Agaricus mushrooms headquartered in Miami, Oklahoma. I also serve as the Vice Chairperson of the Mushroom Council, which is a non-profit industry-led organization comprised of significant fresh mushrooms producers and importers. The Council's mission is to expand, maintain, and develop markets for fresh mushrooms in the United States and abroad through research and promotion.

Growing and selling fresh mushrooms has been a way of life for my family, as well as the hundreds of loyal workers that our farm employs, for decades. My father, uncle, and Darrel McLain founded J-M Farms in 1979. I started working at J-M that year when I was in the tenth grade, and I have worked continuously at our family's farm ever since.

When J-M was first established, we produced approximately 40,000 pounds of fresh mushrooms in a week. J-M's operations have expanded over the years and now consist of six growing sites that produce the fresh mushrooms that we pack at our processing facility. As a result of these expansions, we now have the capacity to grow well more than 10-times that amount.

Over the past few years, increasing volumes of low-priced imports from Canada have injured our family's farm and the entire industry growing fresh mushrooms in the United States. I am very concerned about our ability to continue to operate our family's farm if these imports are not addressed.

I have seen claims by Canadian producers that they have captured an increasing share of the U.S. market due to superior quality. That is untrue. The quality of the mushrooms produced by our farm and by other U.S. producers is every bit as good as – if not better than – the quality of the Canadian mushrooms. Indeed, if the quality of Canadian mushrooms was truly superior to the quality of the U.S. produced mushrooms, it would make no sense for the Canadian growers to undercut our prices to

gain share as they have done. Moreover, some of our customers sell both U.S. and Canadian mushrooms in the same store side-by-side, and in some cases from affiliated U.S.-Canadian suppliers. If the quality of the Canadian mushrooms was truly superior, why would our customers market mushrooms from both sources, particularly from the same brand.

Earlier this year, at a meeting of the Mushroom Council, I spoke with a senior executive of a mushroom producer that operates in both the United States and Canada. Our conversation occurred shortly after President Trump announced that he would exempt products that originate in Canada under the USMCA rules from reciprocal tariffs – meaning that fresh mushrooms from Canada would, once again, come into the United States duty free. I was extremely surprised that this individual told me his company would have shut down their U.S. operations if the Trump tariffs had continued. The comment suggests to me that the company's profits were generated by their Canadian operations, and those profits are being used to subsidize the company's U.S. operations. Without the profits generated by the Canadian company, the U.S. operations were – at best – a break-even proposition.

This same situation is reflected by recent investments that have been made in fresh mushroom operations. While there are regular announcements being made about investments to expand operations and efficiency by fresh mushroom producers in Canada, there have been limited announcements by U.S. growers in recent years.

As I suspect is the same with other U.S. producers, our farm's unhealthy and declining financial condition has prevented us from pursuing much-needed capital investments. Of even greater concern in the near-term is that we have been forced to reduce our production of fresh mushrooms to streamline the farm's operations, with exactly the impact you would expect on our farm's revenues and earnings.

J-M Farms has been in operation for more than 45 years and has continued to operate despite many challenges. Without relief from increasing volumes of low-priced imports from Canada, however, I am extremely concerned about the future of our family's farm. So that we may continue in operation, J-M Farms and its hundreds of employees urge the Commission to reach an affirmative preliminary injury determination in this case.

Thank you for your time, and I will be pleased to answer your questions.

**CERTIFICATION**

This statement is made in accordance with 28 U.S.C. § 1746. I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct to the best of my information and belief.

  
Pat Jurgensmeyer

Dated: November 20, 2025

**Testimony of Charles Ciarrocchi**  
**Fresh Mushrooms from Canada**  
**U.S. International Trade Commission**  
**Preliminary Investigation**  
**November 21, 2025**

Good morning. My name is Chuck Ciarrocchi, and I am the President of Modern Mushroom Farms, which is a grower of fresh Agaricus mushrooms. Our company is headquartered in Toughkenamon, Pennsylvania and operates multiple growing locations in and around the Toughkenamon-Kennett Square area. Modern Mushroom Farm's roots trace back to my grandfather, who immigrated from Italy to America in 1914 and settled in the blossoming mushroom community of Kennett Square. Following a stint as a mushroom harvester, he built a small farm in the 1920s. My father and his siblings worked in various aspects of the growing process. Back in those days, it was common for local family farmers to barter family members to other family farms in exchange for a hearty breakfast.

In the early 1990s, fresh mushrooms grew as a category with the rise of the pizza industry's use of fresh mushrooms as opposed to canned mushrooms. The Mushroom Promotion, Research and Consumer

Information Act of 1990 resulted in the creation of The Mushroom Council, which further drove growth of the fresh mushroom category through organized marketing and promotion.

The Canadian fresh mushroom industry has its roots in small family farms as well, but by the early 2000s Canadian farms transitioned into corporate farms. Driven by the bottom line, the Canadian mushroom industry took notice of the growth in the U.S. market and began testing the waters for potential market share.

Our company has a supply relationship with Giorgi Mushroom Company in which Giorgi buys 100 percent of the mushrooms we grow. This arrangement worked well for Modern Mushroom for several years, but increasing volumes of low-priced Canadian imports have negatively affected what we thought was a protected position.

In 2022, Giorgi stopped accepting our soup grade mushrooms, as it began losing food service sales to Canadian imports. Our production of higher quality mushrooms, typically reserved for retail sales, were enough to satisfy all of Giorgi's demand given the reduction in Giorgi's food service sales. To deal with its declining sales volumes, Giorgi asked us to

reduce our production significantly in 2023 and 2024. Given our company's production operations, it is not feasible to reduce our production volumes by the amount requested by Giorgi and produce efficiently. Instead, we had to reduce our volumes by an even greater amount to maintain efficient production. Ultimately, eleven of our growing houses have been taken out of operation.

Even with scaled back production in 2023 and 2024, we have been unable to sell all the mushrooms we grow. We have been forced to sell retail-quality mushrooms at lower quality products and to discard mushrooms that we cannot sell. This problem has become increasingly severe in 2025.

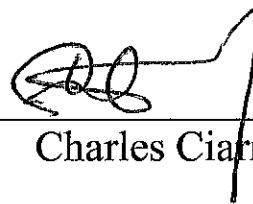
Low-priced imports from Canada have also prevented us from increasing prices to cover our costs. We have obtained price increases of just a few cents per pound over the last several years despite our costs for raw materials, fuel, and labor surging by much more. The results on our company's bottom line have been as expected, with our already unhealthy finances deteriorating further over the last several years.

We are a family farm, and I'm proud to say we are now a fourth-generation family business. My nephew and my son are both managing their respective farms, Sher Rockee Mushroom Farms and Modern Mushroom Farms. Reduced production, combined with fixed costs substantially increasing overhead is a deathknell to any U.S. farm. Our survival as an industry is in peril if Canadian imports are left unchecked.

I appreciate your attention this morning, and I would be pleased to answer your questions.

### **CERTIFICATION**

This statement is made in accordance with 28 U.S.C. § 1746. I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct to the best of my information and belief.

A handwritten signature in black ink, appearing to read 'Charles Ciarrocchi', is written over a horizontal line. The signature is stylized and cursive.

Charles Ciarrocchi

Dated: November 20, 2025

**Testimony of Ron Moule**  
**Fresh Mushrooms from Canada**  
**U.S. International Trade Commission**  
**Preliminary Investigation**  
**November 21, 2025**

Good morning. My name is Ron Moule, and I am the Chief Operating Officer for Kennett Square Mushroom Operations LLC, or KSMO for short. I have worked at KSMO, an *Agaricus* mushroom grower, for approximately two and a half years. Prior to joining KSMO, I have held various roles in agriculture-related research and operations for nearly two decades.

KSMO is a successor to Cardile Mushrooms, which was purchased out of bankruptcy by a U.S. based private equity fund in 2021. We grow fresh *Agaricus* mushrooms, including white button mushrooms, criminis or “Italian browns,” and portobellas, which are criminis that grow for a longer period before being harvested.

I was hired as Chief Operating Officer of KSMO on May 1, 2023. On the same day I was hired, we received a visit from our packer asking us to cut back our production because the packer’s retail and food service sales were weak. As a result, since my first week at the company we have been fighting an uphill battle seeking to accommodate our packer and improve efficiencies to maintain a modicum of profitability. In 2024, our packer asked us to make even deeper cuts in production. In 2025 it has been more of the same, and without trade relief I expect that we will have to further reduce our production of fresh mushrooms in 2026 – perhaps our deepest cut-back since I’ve been with the company.

Let me take a step back and explain a few points about KSMO and independent growers more generally. Our business is focused on the production of fresh *Agaricus* mushrooms, which must be sold to a packer for further processing and sale in retail and food service channels. In our case, our packer is obligated to purchase 100 percent of the mushrooms we grow. However,

realistically, when our packer is unable to sell fresh mushrooms, we must do our best to accommodate the packer because if the packer is not successful, we cannot be successful.

As several witnesses have already described, there are three primary channels through which fresh mushrooms are sold – retail, food service, and processing – and these channels have typically demanded different qualities of mushrooms. KSMO has an 8-week grow cycle. During the first four weeks, spawn grows mycelium throughout our mushroom beds. During the final four weeks, there are three “breaks” or “flushes” from which we harvest. The first harvest typically provides the most weight and quality, followed by the second and then the third breaks. Approximately eight percent of production is generally considered a soup grade that would be used by a processor. With our packer seeking major cutbacks in production, however, higher quality mushrooms are finding their way into processing applications reducing the demand for soup grade to little or nothing.

This circumstance has multiple negative effects on our operations. First, we are losing sales volumes. Second, for higher quality mushrooms that are typically sold in retail or food service, the lack of demand in those channels forces us to accept significantly lower soup grade prices for these mushrooms. Third, for soup grade mushrooms that would typically be sold for processing, we are simply having to discard these mushrooms as a sunk cost. We have had to destroy significant volumes of lower quality mushrooms for three straight years, a major drag to our bottom line. Our fixed costs are, by definition, fixed so these lower volumes and lower prices simply eat away at our profits.

With reduced profits, we have had to postpone planned expansions of our compost tunnels. In addition, our capital investments have largely been limited to maintaining basic operations rather than reinvesting in our company to strengthen its efficiencies and competitiveness.

KSMO is not unique in this industry. We are an excellent mushroom grower, capable of supplying very large volumes of fresh *Agaricus* mushrooms for all sales channels. But when low-priced Canadian imports are taking market share from our packers, the injury is felt just as acutely at the grower level in lost sales volumes, lower prices, and in an inability to invest and advance our business.

Thank you for your time and I will be pleased to answer your questions.

**CERTIFICATION**

This statement is made in accordance with 28 U.S.C. § 1746. I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct to the best of my information and belief.



Ron Moule

Dated: November 20, 2025

**PUBLIC CERTIFICATE OF SERVICE**

Fresh Mushrooms from Canada  
USITC Investigation Nos. 701-TA-778 and 731-TA-1764 (Prelim)

I hereby certify that on November 20, 2025, copies of the foregoing public submission were served upon the following via email:

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John M. Herrmann