



DIVISION OF
CORPORATION FINANCE

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
WASHINGTON, D.C. 20549

April 24, 2020

Joel Silva
Corporate Controller
CALAVO GROWERS INC
1141-A Cummings Road
Santa Paula, CA 93060

Re: CALAVO GROWERS INC
Form 10-K for the Fiscal Year Ended October 31, 2019
Filed December 19, 2019
Form 8-K Filed December 20, 2019
File No. 000-33385

Dear Mr. Silva:

We have completed our review of your filing. We remind you that the company and its management are responsible for the accuracy and adequacy of their disclosures, notwithstanding any review, comments, action or absence of action by the staff.

Sincerely,

Division of Corporation Finance
Office of Life Sciences