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