

Angela C. Snyder
Office of the Deputy Administrator
Poultry Programs, Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, SW.
STOP 0256, Room 3932-South
Washington, DC 20250.

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CFR Citation: 7 CFR 1150, 1160, ETC

Dear Angela:

On behalf of the National Watermelon Promotion Board, I am providing you with comments on the proposed rule to exempt organic producers from assessment by research and promotion programs.

- Any handler of watermelon that deals with both organic and non-organic watermelon cannot exempt any part of the National Watermelon Promotion Board's assessments collected from the producer, nor from that handler's portion of the assessment for either organic and non-organic watermelon .
- Burden of proof of organic rests with the producer or handler and not the National Watermelon Promotion Board.
- Any producer or handler claiming organic exemption should be subject to a National Watermelon Promotion Board audit.
- No imported watermelon shall be exempt from the National Watermelon Promotion Board assessments due to the difficulty in certifying organic production from a foreign country.
- No exemptions for organic will be given by the National Watermelon Promotion Board unless the entire business entity is certified organic for the previous three growing seasons.

Sincerely,

Mark Arney
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National Watermelon Promotion Board
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