

July 31, 2009

Rayne Pegg, Administrator
US Department of Agriculture
Agricultural Marketing Service
1400 Independence Avenue, SW, Room 3170-S
Washington, DC 20250-0247

Re: Proposed Federal Marketing Agreement for Leafy Green Vegetables

Dear Administrator Pegg,

On June 8, 2009 a coalition of proponents petitioned the United States Department of Agriculture's, Agricultural Marketing Service (AMS) to establish a national marketing agreement for leafy greens. We declared our interest in pursuing an agreement believing that such a program "would provide a clear and logical framework for signatory handlers to improve the quality of U.S. and imported leafy green products" and that it would "...empower industry representatives to engage proactively with USDA, the US Food and Drug Administration (FDA), and others in the development of production and handling practices...."

Along with our letter requesting AMS' consideration of a national agreement we submitted DRAFT language and other documentation to support our petition. Since that time we have begun to get feedback on the DRAFT as it was proposed. We understand that both proponents and USDA will receive continuous feedback throughout the process of debating and developing a national marketing agreement. In the short period since our request we have received several comments and questions that if incorporated or addressed in the DRAFT would result in an improved document. Key among these are an expanded set of definitions, several clarifications of language as well as minor modifications to include representatives of USEPA on the Technical Review Board and ensure periodic review of any established audit metrics.

We believe these modifications improve on the submitted DRAFT and are offering this revised version in advance of any federal register notice in the hopes that this DRAFT will gain broader acceptance. As proponents we are committed to ensuring the development and acceptance of a national marketing agreement that meets the diverse needs of the industry, regulatory partners and public at large. We have a common goal in advancing a program that will increase the quality of leafy greens by enhancing our ability to minimize the potential for microbial contamination. We remain committed to working collaboratively with all stakeholders to achieve that goal.

Sincerely,
United Fresh Produce Association
Produce Marketing Association
Georgia Fresh Vegetable Association
Georgia Farm Bureau
Texas Vegetable Association
Arizona Farm Bureau
Leafy Greens Council
California Farm Bureau Federation
California Leafy Green Products Handler Marketing Agreement
Grower-Shipper Association of Central California
Western Growers
Imperial Valley Vegetable Growers Association

CC. David Shipman, Associate Administrator, AMS
Robert Keeney, Deputy Administrator, Fruit and Vegetable Programs, AMS
Mike Durando, Branch Chief, Marketing Order Administration Branch, AMS