



September 23, 2009

USDA's Agricultural Marketing Service
Administrative Law Judge

**Re: Proponent Testimony for the Proposed National Leafy Greens
Marketing Agreement No. 970**

My name is Laura Giudici Mills and I represent the fourth generation in the Giudici family to be involved in farming and agriculture in the Salinas Valley. I have been employed as the Director of Food and Workplace Safety for Metz Fresh, LLC the past two years. My work in the Central Coast agricultural industry began as a youth on my family's farm in San Lucas. Since 1985, my work experience has included produce sales, commodity management, agricultural – environmental consulting and food and workplace safety consulting for growers, grower-shippers and two non-profits – Central Coast Water Quality Preservation, Inc and the Salinas River Channel Coalition.

Our President, Andrew N. Cumming, currently serves on the CA LGMA Advisory Board and on the Board of Directors for both the Grower-Shipper Association of Central California and the CA Leafy Greens Research Board.

Metz Fresh, established May 30, 2000, handles only leafy greens and has growing and harvesting operations in both the Salinas, CA and Yuma, AZ growing regions. We are considered to be, based on SBA definitions¹, a large grower/shipper and handler. Our ten growers, who grow our fresh spinach, spring mix and arugula crops and the majority of our freezer spinach crop, have operations that range in size from 100 land-acres to over 4,000 land-acres. These ten growers are also investors in our company and they all grow crops for other handlers. We contract with another six growers to grow the balance of our freezer spinach crops.

All of our primary growers are either second, third or fourth-generation family farmers. Only two of them employ a full-time food safety person in their operations. The other eight growers have utilized a combination of food safety consultants and/or their own personal time to develop, implement and manage their food safety programs.

¹ Handler – small is < \$7 million in cash receipts; Grower - <\$750,000 in cash receipts