

September 24, 2009

Hearing on Proposed Marketing Agreement # 970
Agricultural Marketing Service USDA

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Veritable Vegetable, San Francisco, California

Thank you for the opportunity to comment on the Proposed Marketing Agreement for Leafy Greens. My company, Veritable Vegetable, is a 35 year old regional produce distributor that has concerns about the proposed rulemaking for several reasons. We service independent retailers by representing small, mid-size, independent and family farms; we work with over 800 growers, most of them directly. We are a NOP certified organic handler, selling and distributing fresh produce throughout California, Arizona, New Mexico, southern Colorado and Hawaii. Our growers, our customers, our business, and the environment would suffer if these proposed rules were adopted nationally.

As a supporter of environmentally sustainable, local food systems and mid-size organic farmers, we strongly urge the USDA to eschew "one-size-fits-all" requirements, especially when such guidelines are not evidence-based and are written by and for large-scale operations.

We do not believe that Marketing Orders or Marketing Agreements are appropriate models for protecting food safety on a national scale. Food safety is an important issue, particularly for anyone in business in our food system. While producers and handlers can help provide technical information and best practices, the safety of our food supply can not be monitored or regulated by industry alone. Agreements designed for individual crops or groups of commodities can not be simultaneously effective unless they are part of a single science based food safety system. Such a system should apply appropriate regional standards considering growing conditions, water quality, climate and environmental quality. What will prevent any market based group from designing conflicting so-called safety standards and protocols in the future? Production and handling would be a chaos, and this proposed agreement, and the Leafy Green Marketing Agreement in California, from which it takes its lead, is already an example of such chaos.

To truly develop a best practices food safety program, cooperation from all sectors of industry, including academia, public agencies, water quality boards, USDA Natural Resources Conservation Service, UC Extension, the EPA, as well as distributors and farmers of all sizes, is needed. I want to stress cooperation. Any standards, guidelines or metrics for agriculture must not have unintended negative environmental