

Moreland Fruit Farm Ltd.  
1558 West Moreland Road  
Wooster, Ohio 44691

5 October, 2009

Greetings

I am a fruit and vegetable grower from Northeast Ohio. I and my family grow many different fruits and vegetable crops marketing many different ways including direct to the consumer on our farm to wholesale through brokers and produce auctions. I and my family are concerned about the Leafy Green Marketing Agreement and the precedent it could set for other agreements and rules of marketing for other fruits and vegetables.

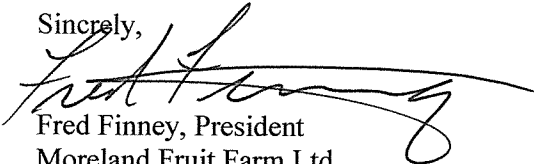
We are diligent in assuring the safety of the crops that we grow and market. We apply a whole host of food safety practices and work extensively to keep up with the latest science based food safety guidelines for our area.

We cannot support this proposal because it tries to encompass too large an area, has so little representation in the implementation process, and appears to unfairly favor one growing area of the country. There are 3 – 4 distinct growing areas in Ohio that make it difficult to even include our state in one zone let alone make an agreement that covers the whole country. I understand that the proposal divides the country into regions, but as distinct as the regions of Ohio are, how many variations in cultural practices are there in the proposed region that includes Ohio stretching from Wisconsin to Alabama.

I am also an advisory board member of the Farmers Produce Auction in Mt. Hope, Ohio. This is one of several produce auctions in Ohio, and one of nearly 60 spread across the Midwest. There are approximately 600 regular growers that market produce through our auction. The buyers at these auctions tell us that the produce purchased from the auctions is the freshest, high quality, local grown produce that they can buy anywhere in the country. Many of the growers at these auctions are "Plain People" or Amish. Most farm with horses, have no electricity or refrigeration, but do have a keen interest in food safety and producing food according to Good Agricultural Practices. Many of these farms are small, from 2 acres to 80 acres. Most use Integrated Pest Management Practices for insect and disease control. Some of the rules in the California Leafy Green Agreement that appear to be the example for the rules going forward in this proposed agreement do not allow for animals in the field for any reason, either for work or by wildlife intrusion. There is no science that tells us this is good or bad. These growers would be severely disadvantaged by any such agreement that would require practices such as audits that would be financially prohibitive because of size and scale of these operations.

It seems like marketing agreements of this nature should be made on a regional or state basis that includes similar cultural practices and growing climates. It makes more sense to allow the states to control their own areas of production with reciprocity in control and acceptance of inspections from one state to another. A one size fits all approach does not appear the solution to food safety issues. This proposal, under the guise of a National Agreement, unfairly favors several specific areas of the country, does not include the diversity of production across this great country, and intentionally or unintentionally adversely will affect the smaller growers in all regions of the United States.

Sincerely,



Fred Finney, President  
Moreland Fruit Farm Ltd  
Farmers produce Auction

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