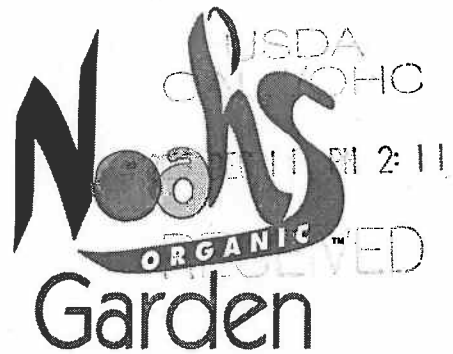


Global Organic Specialty Source, Inc.



Distributing a full line of organics throughout the Southeast and Abroad.

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To whom it may concern,

Global Organic Specialty Source, Inc. is a Florida based organic produce distributor. We distribute produce to a wide range of customers from small families to large retail stores throughout the Southeastern USA, however, the bulk of our business is centered in our home, Florida. I would also like to note that although I am President of the company, I am also a small organic farmer in Sarasota.

We take the issue of Food Safety very seriously. We are certified by Primus Labs and NOP certified by QCS. Both of these bodies demand a proliferation of paperwork and protocols for auditing purposes. This requires at least one full-time position and a division of work to maintain records, traceability, farm certifications and in-house safety protocols among our handful of administrators.

It is important to express that we fully support the need for a clear, federally regulated Food Safety protocol, one which is scientifically validated, risk-based, and protects farm diversity as well as consumer choice.

The LGMA is not the direction that we would support. We do not believe that Food Safety should be handled by a marketing agreement and see a potential conflict of interest in that arrangement.

We also do not believe that a "crop by crop" approach is the correct response. We see this as a reactive stance rather than a pro-active program, not unlike the damage inflicted upon the organic industry by the standards put into place for raw almond pasteurization. To react on a product by product basis would require unreasonable amounts of redundant paperwork that would put a great financial strain upon the company and endanger our ability to sustain our business. We would certainly lose a precious part of our supplier base, as the requirements for the LGMA are geared towards larger suppliers who can afford the numerous testing requirements for water sources and expensive pathogen testing. The LGMA also outlines modifications to the natural environment for "animals of significant risk" that directly contradict the organic farmer's commitment and requirement to remain sustainable and supportive of

biodiversity. Many of our smaller suppliers simply could not afford to comply with the LGMA and would be forced out of business. This includes my own ten acre farm. I simply could not absorb the additional costs for compliance with the LGMA.

The loss of these small farms would significantly impact our distributorship as the requests for local produce from our customer base is rising by the day. Any magazine, newspaper, or website freely uses the vernacular of the "localvore" or "eating sustainably" – and this is clearly the direction in which the organic food industry is rapidly marching. Our customer demands - from the small organic cooperative to the largest retailers - for local and regional produce has shown significant growth and continues to be a primary focus of our future business planning and strategy. Without the ability to source from small, local farms, our business is at risk.

One cannot compare the Florida leafy greens growing season to that of California. Our season is short and, unlike wine which increases in quality from the time of harvest, leafy greens require competent, safe, and fast handling in order to insure a quality product. The race of time from harvest to the consumer's table is a key component to the success of our distributorship. The onus put upon growers and suppliers in Florida would be enormous in relation to the actual yield and we fear that many farmers would cease to grow leafy greens in our region.

In conclusion, we support a pro-active, single food safety program that takes into consideration the various growing cycles, weather, and environments of the U.S. regions as well as make it feasible for small, organic, local, and/or family owned farms to survive. The LGMA is not the solution to our national food safety issues.

Thank you.

Mitch Blumenthal, President/Farmer
Global Organic Specialty Source, Inc