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Fresh Tomato Growers Exchange

February 19, 2004

Mr. David Priester
Fresh Products Branch
Room 1661-S, USDA
STOP 0240,
1400 Independence Ave. SW,
Washington DC 20250-0240

Subject: Proposed Amending of U.S. Grade Standards for Greenhouse Tomatoes

Dear Mr. Priester:

The California Fresh Tomato Growers Exchange, a producers cooperative representing producers of field and greenhouse grown tomatoes, wish to comment on the proposed amending of the U.S. Grade Standards for Greenhouse tomatoes. The Exchange membership represents better than 87% of the tomatoes produced in California. Its members also produce tomatoes in Mexico.

Recommendation: The Exchange believes that the proposed standards are without any significant meaning unless there is a standard definition as to what represents a greenhouse tomato. It is our recommendation that USDA adopt the standard found in the California Food and Agriculture Code as the formal definition for greenhouse grown tomatoes.

History of the California Definition: With high-tech greenhouse production on the rise in California during the 1990's, the California fresh tomato industry undertook development of a standard definition for greenhouse tomatoes that we believe represents the standard minimum production requirements for a true, greenhouse grown tomato.

Greenhouse tomato production is increasing throughout North America. For much of the United States, Canada, and Mexico, how members of the trade define greenhouse production is mostly subjective. For example, some growers simply lay plastic over their staked tomato plants, and call such production "greenhouse". Other growers lay mesh or cloth over their stakes, and term the production "greenhouse". We are aware that these growers may market their tomatoes as greenhouse or as field tomatoes based upon market conditions and grading standards. Thus, if pricing is higher for greenhouse, these tomatoes are then termed "greenhouse grown", if the prices for field tomatoes are higher, they

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are marketed as field tomatoes. The same practice can be said for how tomatoes are marketed based upon tomato quality. These actions are detrimental to most growers, the trade, and the consumer.

The California Statute: The enacting legislation of the California Tomato Commission provides a definition for greenhouse tomatoes that we believe appropriate for defining greenhouse tomato production as it applies to the USDA Grading Standards for Greenhouse Grown Tomatoes.

This same definition is also in rule making for defining "greenhouse grown tomatoes" at the California Department of Food and Agriculture - Standardization, the California counterpart to the Fresh Products Branch at USDA. Upon adoption by Standardization in mid-2004, greenhouse tomatoes produced in California will be regulated under Article 43 of the California code, and may be marketed as "greenhouse" only if they are produced in keeping with the definition in section 78636(b).

Food and Agriculture Code: 78636. (a) "Tomatoes" means all tomatoes that are produced for commercial purposes and are handled within the state in fresh form, except cherry tomatoes, and tomatoes grown in a greenhouse.

(b) For purposes of this section, "tomatoes grown in a greenhouse" means tomatoes grown in a fixed steel structure using irrigation and climate control, in an artificial medium that substitutes for soil.

Summary: For any grade standard to exist for greenhouse grown tomatoes, there must be a standard definition of what represents a greenhouse-grown tomato. California is a major producer of greenhouse tomatoes; as the State of California has already adopted a regulatory scheme to define greenhouse grown tomatoes, we believe that the USDA should adopt the existing formal greenhouse definition in its amending of the Grade Standards for Greenhouse Grown Tomatoes.

Sincerely,



Edward Beckman
Chief Executive Officer