

# NAPAR

North  
American  
Perishable  
Agricultural  
Receivers

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## Contributor Members

A & J Produce Corp.  
A. Vassallo, Inc.  
Andrews Brothers, Inc.  
Capital City Fruit Co., Inc.  
Caribbean Produce Exchange, Inc.  
Castellini Company  
W. D. Class & Son  
Community-Suffolk, Inc.  
Consumers Produce Co., Inc.  
D'Arrigo Bros. Co. of New York  
East Coast Fruit Co., Inc.  
Federal Fruit & Produce Co., Inc.  
Joseph Pierman & Son, Inc.  
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The L. Holloway & Bro. Co.  
The Horton Fruit Co., Inc.  
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J.C. Banana Company  
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T.M. Kovacevich-Philadelphia, Inc.  
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Procacci Brothers Sales Corp.  
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Royal Banana Company, Inc.  
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Ben B. Schwartz & Sons, Inc.  
Stores' Fruit and Produce, Inc.  
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United Fruit & Produce Co., Inc.  
John Vena, Inc.  
Verdelli Farms, Inc.  
Tony Vitano Company  
Wakefern Food Corporation  
Wick and Brother, Inc.

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Agricultural Marketing Service  
U.S. Department of Agriculture  
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Washington, DC 20250-0240

Dear Mr. Priester:

Re: United States Standards for Grades of Cucumbers  
**Docket #FV-04-307**

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining the need to proceed with a revision to the U.S. Standards for Grades of Cucumbers.

NAPAR surveyed many of its wholesale-receiver members, soliciting their input on the probable impact the proposed changes would have on their business operations. Their comments indicate that there is a tremendous need in the marketplace for the U.S. Standards for Grades of Cucumbers to be upgraded and more accurately reflect the terms and specifications that are regularly employed in real-world trading practices.

While the terms Super Select, Select, Small, Large and Plain are commonly used by the industry to convey the desired size, quality and condition of cucumbers, the criteria for these terms are not consistently defined. As a result, the meaning is often interpreted differently by various trading partners. Because Small and Large are only defined under U.S. No. 1 grade and not under No.2 grade, and because there are no specifications for the terms Super Select, Select and Plain in the U.S. Grade Standard

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for Cucumbers, they're often not directly enforceable through USDA inspections. As a result, disputes are frequently settled according to the economics of the marketplace, where smaller receivers can find themselves having to absorb losses for received shipments that don't meet the expected size and quality standards.

Regardless of the industry term on the outside of the carton, cucumbers from certain growing regions frequently contain a mixture of sizes within the same carton. Boxes, for example, that state Select on the label, will sometimes contain a mixture of what would be considered Super Select, Select and Small within the same case. While the count may fall within expectations for the stated pack size, the size and shape of the cucumbers within the pack can be alarmingly inconsistent. This makes it very difficult for wholesaler receivers to satisfy the demands of their own customers without having to go through the expense of repacking the load.

For example, a load of Super Select cucumbers, which are generally graded to U.S. #1 standards, might range in size from 1½ to 2¾ inches in diameter and anywhere from 6 to 12, or more, inches in length (without being considered overgrown).

Our members believe that wholesale receivers and the greater produce industry would be better served if current trading practices were supported by a system of U.S. Grade Standards that establish reasonable parameters for size, consistency of size within packs and provide more meaningful definitions for quality and condition.

Please feel free to contact me if NAPAR can provide further assistance during this process.

Sincerely,



Patrick A. Davis  
President