



February 6, 2004

Facsimile Transmission  
202 720-8871  
FPB.DocketClerk@USDA.gov

Mr. David L. Priester  
David.Priester@usda.gov  
Standardization Section  
Fresh Products Branch  
Fruit & Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Room 1661 South Building, Stop 0240  
Washington, D.C. 20250-0240

Dear Mr. Priester:

**Re: United States Standards for Grades of Field Grown Leaf Lettuce  
Docket #FV-04-303**

Western Growers is an agricultural trade association whose 3,000 members grow, pack and ship 90% of the fresh vegetables and nearly 70% of the fresh fruits and nuts grown in Arizona and California, which accounts for over one half of nation's fresh produce production.

It is on behalf of these members that I am submitting these comments to ascertain if there is a need for a new standard to be developed for leaf lettuce grown in open field as it relates to sections pertaining to grades, tolerances, applications of tolerances, pack requirements, definitions, and other relevant and necessary provisions of any potentially developed grade for leaf lettuce.

Western Growers Association surveyed its members who grow, pack or ship field grown leaf lettuce, soliciting their input on the possibility of developing standards for leaf lettuce and the probable impact on distributors, processors and growers.

After reviewing their comments there was no clear consensus to support the development of standards for leaf lettuce. Many of our members did think it was important to establish new standards for leaf lettuce, some of the shipper members were of the opinion that there may not be a need as they have been shipping green leaf and red leaf lettuce and other leaf lettuces all these years without an established

Mr. David L. Priester  
Standardization Section  
February 6, 2004  
Page 2

grade, and did not feel they were being impaired in any way in the marketing of their leaf lettuce due to the fact that a grade did not exist.

Separately, some of our shippers felt having a grade for leaf lettuce was important due to the fact that it probably would be more consistent with romaine and iceberg lettuce as it relates to destination tolerances. Currently the destination tolerance under an FOB no grade sale for field grown leaf lettuce is compared or referenced to the standard for green house leaf lettuce which does have a restrictive tolerance. Those wanting a standard for green leaf and red leaf field grown lettuce, feel that the destination tolerance under an FOB no grade contract would more equitable and consistent with romaine and iceberg lettuce at contract destination.

Regardless, those members that have not seen the need for a new standard for field grown leaf lettuce, still want to be part of any discussion in developing a new standard should, after all comments have been received, the department determines that there is a need for standards for leaf lettuce.

In addition, Western Growers wishes to be a major participant in developing this standard should it be determined one needs to be developed. Please let me know if there is anything further I can provide for your review.

Very truly yours,

THOMAS R. OLIVERI  
Manager, Marketing Services

TRO/tmg

C: Leanne L. Skelton - [leanne.skelton@usda.gov](mailto:leanne.skelton@usda.gov)