

from: Mrs Joyce Evans
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Docket Clerk

TO: Attn: R. J. YAKS, Administrator
Ag. Mktg. Service USDA
1400 Independence Ave.
Washington, D.C. 20250-0237

Re: Docket No. FV04-989-610 Review
Raisins Produced From Grapes Grown
in CALIF. 7 CFR PART 989

① This Mktg. Order applying only to CALIF RAISIN PRODUCERS should be rescinded. Raisins flood the U.S. market from all over the world. They do not pay their share of Raisin Adm. costs or advertising costs. All they have to do is meet minimum grades. Packers can blend these with CALIF RAISINS or simply stalk ("pack in CALIF"). Even raisins coming in from ARIZONA come in under these loopholes. This Mktg. order discriminates against the CALIF. Grower and should be abolished.

② I can see no continued need for the Mktg. Order. As long as the packers control the Raisin Adm. Comm. this Raisin Mktg. order as presently stated is a recipe for disaster - noting the present state of affairs with over 100,000 acres of vineyards being destroyed or growers filing for bankruptcy protection it doesn't take a rocket scientist to know that this Mktg. order is a recipe for disaster for the CALIF RAISIN PRODUCER. The only people buying vineyards at these disaster prices are the RAISIN PACKERS.

③ I have referred to the complexity + unfairness + discriminatory effect against the CALIF RAISIN PRODUCER in (1) above.

④ The MKTG ORDER conflicts with the 1990 ORGANIC FOOD PRODUCTION ACT of 1990 (ACT OR OFPA). The RAC refuses to accept organic RAISINS exist except for requiring information on organic production including Acquisitions & shipments. Organics cannot be fumigated - MKTG ORDER requires ALL RAISINS to be fumigated. In a 12-24-2000 Letter from Robt C. Keeney to Mr Marvin Horne he stated that much of the organic tonnage is exported & that growers benefit from the Reserve ^{pool} - this is a bunch of baloney!!. My 1-30-2003 letter to Mr. Keeney is attached. I and others have been corresponding to USDA Washington for over 25 years with no results for the financial welfare of all Raisin Growers. Organic Raisin Growers can sell 100% of their raisins & subjecting them to a Reserve pool is a joke. The packers are the main beneficiaries of this welfare program.

⑤ Technology & economic conditions have changed since this MKTG ORDER was originally enacted in 1937. Witness the advent of the OFPA in 1990 with subsequent financial enforcement in 2000. Also Television in the 1950's & the new ORGANIC MKTG.

⑥ The MKTG ORDER regulates the handling of RAISINS produced in California. Please note that it does NOT mention the production of CALIF RAISINS. So I can presume that this MKTG ORDER only applies to packers NOT producers & that all producers are exempt. The R.A.C. does not even know what parity is. Also for example Sec. 989.53 (1) & 989.54 (7) (8) have never been addressed.

At the present time the best thing for the Raisin producers is to bring a timely death to the Raisin MKTG ORDER No. 989.

Sincerely,
Joyce Evans

Ms. Joyce Evans
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Phone: 559-864-3134

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January 30, 2003

Mr. Robert C. Keeney
Deputy Administrator
Fruit & Vegetable Programs
United States Dept. of Agriculture
Agricultural Marketing Service
P.O. Box 96456 FAX: 202-720-0016
Washington, D. C. 20090-6456

Dear Mr. Keeney:

I was privy to the letter you wrote to Mr. Marvin Horne December 24, 2002 and am adding my comments to our ten year struggle to have certified organics declared a separate varietal under the hopelessly out-moded Raisin Marketing Order No. 989.

I believe you truly believe that the Raisin Administrative Committee is acting in the best interests of the certified organic raisin producer. However, that is not true. Maureen Pello arranged a tele-conference with AMS officials and Keith Jones in Washington D.C. and they said they have no objection to a separate varietal for certified organics and cited Florida Citrus and California Almonds for having segregated certified organics in their marketing pools.

The next thing to be heard from the RAC was that they had no idea what our tonnage was even though we have given them the best guessestimates, as growers, that we could give. They then proceeded to give us the excuse that as soon as they mandated tonnage from the packers our request would be considered. They have had the tonnage figures for 2 years, and of this date, I have never heard any response from them.

Your statement that organic tonnage was being sent for export really surprised me. I have had no response to my correspondence to the R.A.C. There were only 6600 certified organic tons produced this year. My question is WHERE IS THE MONEY? If the RAC is doing me such a favor by exporting my certified organic raisins why am I in Chapter 12 Bankruptcy?? IS THE RAC USING MY ORGANICS TO USE AS BAIT TO SELL THEIR REGULARLY PRODUCED RAISINS?? With such a small amount of certified organic tonnage I could sell my entire production (which is quite small) to meet the huge demand in the United States.

Mr. Robert C. Keeney
January 30, 2003

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I have not heard of any of the other varietals that have been subjected to forced export regulations as have our certified organics.

When you say that the RAC concluded that organic producers benefit from the volume regulation and export programs implemented through the reserve pool it sounds like the packers are talking and not the growers involved.

Marvin Horne and I have been trying to make the RAC understand what the concept of organic is and our discussions always fall on deaf ears. If the concept of the marketing order is to maximize returns to the growers, this concept is definitely not working for the growers and is laughable if it wasn't so tragic.

If you will note the separation of the other varietals under the marketing order all of them are packer controlled. Organics are about the only raisins that benefit the grower and that is a growing market by about 20% yearly. The regular raisin industry is in the dumpster, losing sales yearly, with an industry dominated by packers who are satisfied with their incomes and do not spend a dime on advertising. All advertising, though limited is paid for by growers with no mention of certified organics.

I don't think it's fair for the packer and the RAC to saddle us with free tonnage percentages and reserve requirements when we see a rapidly expanding market where we can sell 100% of our raisins yearly at a good profit to the grower, not the packer.

You were present at one meeting with a lot of unhappy growers. Nothing has changed since. As a matter of fact we are in a worse situation now than when you were here.

All I am talking about is survival. I can't go down the tubes with the rest of the raisin industry when my product is so successful and I am able to sell it at a good price myself and not have my money go down the RAC drain.

I hope you understand that the RAC is not helping the organic grower at all. One member even told me "why should I let you out of the marketing order when I have to stay in it". Which explains that they do not understand what the term organics means!

I hope this makes you understand that the RAC is my enemy and not my understanding committee that is supposed to maximize my profits or income.

Sincerely,

Joyce Evans
Joyce Evans

cc:Maureen Pello
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Maureen Horne
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From:

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ELI SETENCICH

'Organic' is still a dirty word

When farmer Steve Pavich decided to drive up from Delano the other day to pitch the benefits of organically grown raisins to the Raisin Advisory Committee, his brother, who had made a similar journey a couple of years ago, had two words for him: "Good luck."

The comment drew a chuckle from the 100 or so raisin growers and packers meeting in the committee conference hall.

But Pavich, a South Valley table grape grower who's also been farming organically for some 30 years, was serious. So were Marvin Horne, a Kerman farmer, Joyce Evans of Caruthers and other like-minded farming purists.

Off and on for the better part of a decade, they and other growers have been trying to persuade the committee to recognize organic raisins, put them on a par with seedless and golden seedless and sultanas and muscats, but they always keep winding up with the same answer.

Each time for the past 10 years, Horne reminded the committee members, "it's taken under advisement." Everyone else, other government agencies, all know and recognize organically grown raisins "except for the RAC," he said. "A shame," he called it. "You cannot ignore it anymore."

ITS NOT AS IF theyre competing

Pavich tried to assure them. Nor are they saying their product is better than that of the others. It's just that there is this growing market for raisins untouched by synthetic pesticides and fertilized by old-fashioned manure.

Thirteen percent of Chile's raisin production is organic, Horne said. Turkey and Iran, the raisin growers' chief competitors, are going organic. "We are missing the boat," he told the audience, which listened in silence.

Finally, the voting members of the federal agency that decides such things as how much of the raisin crop to put on the market and how much to place in reserve, found their voice, and it sounded familiar.

Once again, they weren't ready to recognize organic. The idea was too complex to vote on right away. They needed time. They set up a working group to study some more.

Good luck, as Steve Pavich's brother is wont to say.

RAISIN D'ETRE: What the raisin folks really need to get the word out is somebody like Sox, the late and lamented A. Setrakian — Sox for short.

Lovable, lyrical Sox, he was Mr. Raisin in the early days, the original and irreplaceable chairman of the board in the '50s and '60s.

Meetings of the raisin committee in the ballroom of the old Hotel Californian downtown were operas — sometimes comic — starring the roly-poly Sox, who yelped and whined and wept until his beloved growers got what was coming to them from the packers and winemakers.

When the feds set a price for the crop he figured was neither fair nor honest, he carried the battle to Washington, prowling the halls of Congress and other hideaways, wailing and crying until they coughed up.

If that didn't get their attention, he went public. He was on the radio nearly as often as Jack Benny. When television came, he went on TV and cried some more where everybody could see.

It was organic with him, you might say.

■ Eli Setencich is a Bee columnist. E-mail him at eli@fresnobee.com