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January 19, 2004

The Honorable A.J. Yates
Administrator, Agricultural Marketing Service
United States Department of Agriculture
Mail Stop 0201
1400 Independence Avenue SW
Washington, DC 20250-0201
VIA FACSIMILE: (202) 720-8938

Re: Proposed Marketing Order Regulating the Handling of Processed Blackberries Produced in the States of Oregon and Washington

Dear Administrator Yates:

Thank you for the opportunity to comment on the proposed marketing order regulating the handling of processed blackberries produced in the states of Oregon and Washington.

As a grower and processor of blackberries, we strongly oppose the proposal to create a blackberry marketing order in the Pacific Northwest. As the Oregon-Washington Blackberry Proponent Committee's proposal asserts, the Willamette Valley in Oregon and Clark County, Washington, are exceptionally efficient in the production of blackberries. Over the years, as production efficiency has increased, the market at times has become over-saturated with blackberries, causing price declines. The Committee's proposal is intended to stabilize this market. We believe this proposal, if it were to be realized, would suffer irreparable harm on the Northwest blackberry industry in addition to dramatically increasing costs of blackberry products to consumers.

The blackberry industry is just now entering a phase of great growth, one that will be sustained for quite some time. Other regions, both domestic and foreign, are gaining efficiencies in blackberry production and are challenging Oregon and Washington's dominance in the market. For instance, there are extensive variety trials and commercial plantings in California; throughout South America, there are processing plants surrounded by thousands of under-utilized acres that may soon be transformed into blackberry fields once market conditions become favorable. Such action is certain to materialize if market regulation is brought to Oregon and Washington.

Regulating production and sales of Oregon and Washington blackberry may provide immediate relief to the interests of the Oregon-Washington Blackberry Proponent Committee; such relief, if realized at all, is assured to be short-lived. As growth is curbed in the Pacific Northwest, growers in California and perhaps other states, as well as those abroad will respond. As a result, processors currently sourcing from within the Upper

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Northwest will look elsewhere. Establishing a marketing order on Oregon and Washington blackberries will encourage imports from out-of-state and abroad, eventually resulting in a shrinking market for Oregon and Washington blackberry producers.

The Oregon-Washington Blackberry Proponent Committee contends in its proposal to have broad support; we strongly disagree. Our company is the largest grower and processor of blackberries in Skagit County, Washington and we have never been approached with this proposal. This entire issue came to our attention through personal inquiry; it is apparent to us the group that initiated this action has not done due diligence in staffing this action with the entire Oregon/Washington blackberry community. Many independent producers were also not approached; instead the Committee relies on support by cooperatives, which are clearly seeking to limit the market of Oregon and Washington blackberries to their own members.

The creation of a marketing order for the handling of blackberries grown in Oregon and Washington will not bring relief to the broader interests of the blackberry industry in the Pacific Northwest. Instead, such a marketing order would encourage imports of blackberries from other states and nations, which either already possess or are close to creating viable blackberry industries of their own. When disruption in the supply chain leads to increased sourcing outlays, the cost to consumers rises as well. The result will be the demise of small, independent blackberry producers in the Pacific Northwest and limited expansion of Oregon and Washington blackberries.

Thank you again for the opportunity to comment.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Bryan S. Sakuma". The signature is fluid and cursive, with a large initial "B" and a long, sweeping underline.

Bryan S. Sakuma