

SNOKIST

SNOKIST GROWERS

July 25, 2003

Mr. Doug Augspurg
USDA
32 N. 3rd Street
Yakima, WA 98902

Dear Doug:

It has been brought to my attention that in the United States Standards for grades of Canned Pears there is a contradiction of grading pears between Halves and Dices, Slices.

Please refer to section 52.1623 Character, paragraph (C), "B" Classification, subparagraph (1) Halves; quarters; pieces or irregular pieces. This reads as follows: "The units may possess a texture of moderate graininess; the units are reasonably tender". Then when you read the instructions for Slices and diced, subparagraph (3) you will find that there is no mention of tenderness for character. What this means is that while halves must be tender, slices and dices can be as hard as a rock and still qualify for "B" grading.

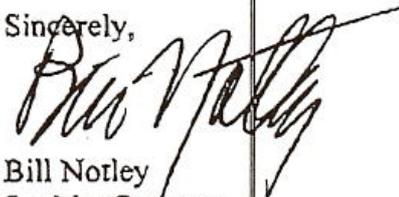
This puts Snokist and the rest of the West Coast canned pear processors at a distinct disadvantage with product coming in from China and other countries around the world. We all know that China's pricing is below what USA pear processors can charge and still be profitable, now their China's inferior product is being graded "B".

This contradiction should be corrected to include the tenderness statement for all styles of pears. This small correction would greatly help our domestic canned pear industry in competing with China and the rest of the world suppliers.

Our industry has seen canned pear imports increase every year, and while we all know we have to compete with other countries, grading of pears should be consistent between all styles.

Your prompt attention to this matter would be greatly appreciated.

Sincerely,



Bill Notley
Snokist Growers

