THE BECKMAN & GAST CO.
SINCE 1928

CUT GREEN BEANS • FRENCH STYLE GREEN BEANS • TOMATOES • STEWED TOMATOES • DICED TOMATOES • TOMATO JUICE • VEGETABLE JUICE

May 19, 2006

ATTN: Trista Etzig
Docket Clerk, Fruit and Vegetable Programs
Agricultural Marketing Service
U. S. Department of Agriculture
1400 Independence Ave., SW. Stop 0243
Washington, DC 20250-0243

Dear Ms. Etzig:

On behalf of The Beckman and Gast Co., I am providing comments in reponse to the April 20 ,2006 prposed rule: *Specialty Crop Block Grant Program; Notice of request for approval of a New Information Collection.* The Beckman and Gast Co. is a full-line tomato and green bean processor, headquartered in St. Henry, Ohio. The Beckman and Gast Co.has 20 full-time and 75 seasonal employees. Our primary product is a full line of canned tomatoes. We supply retail outlets nationwide.

This rulemaking is an important step in assuring that specialty crop block grant funds are used appropriately by states to enhance the competitiveness of specialty crops, with the ultimate goal of helping consumers improve their health by eating more fruits and vegetables.

The Beckman and Gast Co. wishes to highlight two major concerns with the proposed rule:

1. The rule is inconsistent with the clear intent of Congress when it passed the Specialty Crop Competitiveness Act in 2004 (Public Law 108-465) and will limit consumer choice by excluding the promotion of all types of specialty crops- including canned fruit and vegetables.

   Section 1290.4 of the proposed rule: *Eligible grant project,* states that:
   (a) To be eligible for a grant, the project(s) must enhance the competiveness of specialty crops. "**Priority will be given to fresh specialty crop projects.**"

   The language giving priority to "fresh" is inconsistent with the authorizing legislation. Congress did not intend for one form of specialty crop to be given priority over others, nor to restrict state departments of agriculture from promoting a variety of specialty crops. USDA has exceeded its regulatory authority in giving preference to **fresh** specialty crops.

2. The rule does not recognize the growing body of evidence on the benefits of canned fruits and vegetables.

   The proposed rule is counter to federal guidelines on nutrition. The *Dietary Guidelines for Americans 2005* identifies canned foods as a way to help people consume the recommended daily variety and amount of fruits and vegetables. Nowhere in the Dietary Guidelines is preference given for fresh fruits and vegetables.

On behalf of the 20 full time Beckman and Gast Co employees, I thank you for considering these comments. I urge USDA to issue
A final rule that is consistent with the will of Congress and recognize the importance of promoting **all** types and forms of healthy and nutritious specialty crops. As proposed, this rule will restrict

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promotion efforts and is counter to open competition. It also does not reflect current scientific knowledge of the importance of all types and forms of fruits and vegetables in promoting health.

Sincerely,

William J. Gast

William J. Gast
The Beckman and Gast Co.
President

Contact information:
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