April 9, 2003

The Honorable Ann Veneman
Secretary, U.S. Department of Agriculture
Country of Origin Labeling Program
Agricultural Marketing Service
Stop 0249 Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

Re: Comments on Guidelines for Voluntary Country of Origin Labeling Program

Dear Secretary Veneman:

I am the manager of a produce department for Long's Pic Pac / Galaxy. As such, I am very concerned about the country of origin labeling guidelines that you issued.

Our produce department offers Approximately three hundred types of fresh fruits and vegetables to consumers on a daily basis. Our produce is sourced from many countries throughout the world to ensure that consumers have high quality produce at an affordable price throughout the year. The task of identifying the country of origin as required by the law for all of these products is enormous. We cannot look at a bunch of grapes or a hand of bananas and identify the country of origin of the product. You must require our suppliers to provide us with that information and to implement systems – such as verifiable segregation plans – to ensure that the information that we receive is accurate; we must be able to rely on the information that our suppliers provide.

As you develop the regulations, please consider the following:

- Hold suppliers who are responsible for fresh and frozen fruits and vegetables at the growing, packing and processing stage accountable for providing accurate information on the countries in which each stage of production occurs;
- Provide for flexible means of informing consumers of the country of origin of fresh and frozen produce at retail; and
- Implement reasonable recordkeeping requirements.

Please issue regulations that will allow us to comply with the law without limiting our ability to continue to provide consumers with a fresh and abundant produce supply.

Sincerely,
Paul Napier
Manager
Long's Pic Pac / Galaxy
Pineville, Kentucky