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October 30, 2024

Administrator Bruce Summers
United States Department of Agriculture, Agricultural Marketing Service
1400 Independence Ave., SW Washington, DC 20250-0235

RE: FMO #959, South Texas Onions marketing order amendments request for Termination Language, Contributions, Paid Advertising, & Public Member

Dear Administrator Summers,

The South Texas Onion Committee (STOC) respectfully requests that USDA initiate the process to amend the Texas Onion Marketing Order § 959 in following four areas: (1) change the threshold for the continuance referendum from 67% to 50% for both voting matrices, (2) include the authority to conduct further marketing and promotion activity, especially the ability to participate in paid advertising, (3) include the authority to accept voluntary contributions from domestic sources and (4) include a membership seat on the committee for a Public Member. At its June 18, 2024, meeting, the Committee voted in favor of requesting consideration for all of these amendments through the “formal through informal rulemaking process.” Included with this submission is the proposed amendatory language and the justification as recommended by the STOC.

In regard to the continuation threshold: The exceeding high threshold of 2/3rd support is challenging, especially for the STOC who has fewer handlers and producers than when the order was formed. Previous votes for the continuation referendum have all experienced a majority of votes in favor of continuation – exceeding 50% of the industry in support – both times have failed to achieve the “super majority” of 67% in support. This has resulted in several additional referendums. The Committee wishes to prevent the issue of additional referenda by instead moving continuation to a simple majority vote.

In regard to the addition of the Public Member: Due to the reduction in the number of producers and handlers, Committee members are often the same In members from year to year. This results in decreased participation and fewer original ideas. Adding a Public Member to the Committee will provide not only perspectives from outside the industry, but it also stands to add new ideas and input to STOC with the intention of continuing to improve the Texas onion industry.

The STOC is aware that a provision in the 2008 Farm Bill amended the AMAA to authorize the use of informal rulemaking procedures to amend marketing orders. In utilizing informal rulemaking procedures, we would reduce costs to both the industry and USDA which are normally associated with the formal rulemaking process. Growers are thus still able to submit written comments to the Department and still

have the opportunity to vote on this amendment.

The amended language being recommending would not have negative regulatory or economic impact to producers, handlers or consumers. Further, it would not reduce the voice of the same. These changes are being suggested as a means of modernizing the committee and increasing the efficiency and abilities of the same with the ultimate goal to increase market share of Texas-grown onions and reach additional consumers.

If you have any questions or need additional information, please do not hesitate to contact us via any of the mediums above.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dante Galeazzi', with a horizontal line striking through the middle of the signature.

Dante Galeazzi
Executive Manager
South Texas Onion Committee