

Pleasant Valley Gardens

"The Bonanno Family Farm since 1910"

255 Merrimack Street, Methuen, MA 01844-6433

978 682-9563

October 20, 2009

To Whom It May Concern,

My name is Richard Bonanno. I am the owner of Pleasant Valley Gardens in Methuen, MA which is located 30 miles north of Boston. I am 4th generation on the farm and we are just finishing our 100th growing season. We raise 50 acres of fresh market vegetables which are almost exclusively shipped wholesale. Our customers include national supermarket chains such as Whole Foods and Trader Joes, local chains, institutional food distributors, and other local farmers who buy for their farm stands, farmers markets, and CSA's. We also have a CSA of our own. We raise 15 acres of lettuce including Boston, red leaf, green leaf, romaine, romaine hearts, and baby lettuce. In New England, most growers produce some lettuce; however there are only a handful of us that produce 15 or more acres of lettuce on our farms. I also work part time for the University of Massachusetts in Extension and, among other duties, have trained growers throughout New England on Good Agricultural Practices (GAP). Two chains that market in New England have required that their growers become GAP certified for the 2010 growing season.

I am opposed to the Leafy Greens Marketing Agreement (LGMA) as posted in the Federal Register on February 3, 2009 and being discussed at the hearing today. Reasons for my opposition follow.

First, this agreement is nothing more than a quick reaction to problems experienced by growers in the west. I certainly appreciate the need for these growers to initiate a public relations effort. They, after all, created a national scare which had a negative economic impact on themselves and on growers throughout the U.S. Combined with a national movement to "buy local" and to "know your farmer", I can see that larger growers in the west are looking to paint themselves in a better light to the public and to derail the "buy local" movement. But that does not mean the rest of us need to pay for their mistakes and for the downfalls of their huge scales of production and processing.

The additional problem, unfortunately, is that I have not seen a conclusive analysis of what went wrong with the most recent "spinach scare". There is no consensus within FDA, as near as I can tell, if it was wildlife, livestock, improper field handling, or a problem within the packaging facility. I still do not have an answer as to why the E. coli 0157-H7 did not die during the

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sanitation process. I personally find it hard to fix a problem when I have no idea what went wrong in the first place.

Another issue is the cost of compliance. Many smaller growers simply do not have the resources. In my own situation, I have created a GAP farm plan, taken some water samples to satisfy my curiosity, and have become more vigilant about potential contamination. However, I do not have the additional resources to become certified and to keep up with all the paperwork. Eventually I might be forced to comply but I do not welcome that time. Another issue is that of being a diversified grower. This proposed marketing agreement is just for one set of crops. I am concerned that I might eventually be forced to agree to and comply with several marketing agreements, each with its own set of requirements, paperwork, and audits. On the upside, I guess that I have some comfort knowing that I live in suburbia and have the option of selling my land when government regulation takes me to the point where selling the farm for development becomes the logical course of action.

On a practical note, I certainly do not think that farms in California or Arizona are any more or less likely than any of us to have the potential for a food safety issue on their farm or their packing facility. We all collectively have wildlife, livestock, water issues, and workers who need to go to the bathroom. The major differences are that we are smaller, rarely comingle product between farms, and, as owners, have more direct involvement in production, harvesting, and packing than do larger growers in the west. If there was to be a problem, the sphere of distribution and potential health issues are very small in comparison. Another way of saying this is that a greater number of smaller growers result in fewer national scares and health issues than a smaller number of larger growers. I am not naïve, however, and do understand that a small numbers of growers produce a significant percentage of our food. I also do not think that this is something we should aspire to or encourage by our actions.

The result of this marketing agreement over time is to reduce the number of smaller growers. This leads to more foreign produce and produce from larger U.S. operations. Ultimately our food supply and the public are more at risk.

I applaud the efforts of western growers to get their own house in order by adopting their own set of standards. I understand their need to improve their public image. I even understand their desire to derail the “buy local” movement. However, dragging the rest of us along and hurting our ability to stay in business is not something I welcome. I urge USDA to say no to the creation of a leafy greens marketing agreement.

Sincerely,

A handwritten signature in dark ink, appearing to read 'AR Bonanno', with a stylized flourish at the end.

A. Richard Bonanno, Ph.D.
Owner