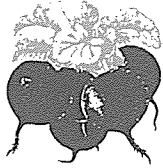


"Always Fresh"



Arrow Brand Vegetables

Grown and Packed by

K. W. ZELLERS & SON, INC.

13494 Duquette Ave. N.E., Hartville, OH 44632

Telephone: 330-877-9371 • Facsimile: 330-877-0243

"Always Appetizing"

October 1, 2009

To Whom It May Concern:

Buurma Farms, Inc., The Chef's Garden, Inc., K.W. Zellers & Son, Inc, Michael Farms, Inc., and Wiers Farm, Inc. are all major producers of leafy greens vegetables seasonally in Ohio (Wiers & Buurma's also supply from other regions seasonally). These five companies distribute vegetables throughout the eastern United States to major retail, wholesale, processing, and food service customers. The demands of our customers warrant intensive management of food safety standards by each of these producers both in the field and packing facilities and are audited as such.

The above Ohio Leafy Vegetable Growers have great concerns about the proposed Leafy Greens Marketing Agreement. History would indicate that adopting regulation without the metrics being agreed upon is a recipe for disaster. We have no confidence in the process once an agreement is adopted that leaves the metrics out of our control. The cultural practices are very different across the state of Ohio, let alone a region that stretches from Georgia to Wisconsin. One example of this difference would be irrigation water, where it originates from, how it is delivered to the crop, and when during the life of the crop it is delivered.

The current California Leafy Greens Marketing Agreement has metrics that are geared towards the production practices in California & Arizona. It is our feeling that while the spinach E. coli disaster certainly warranted proactive action by the industry, the current agreement was a knee-jerk reaction to the problem. We are very concerned that some of the metrics in the California Agreement are not based upon sound-science. It is very difficult to push back on regulation once it has been adopted, even if the suggested change is scientifically justified.

It is clear to all that California & Arizona produce a significant amount of the leafy greens in question. Yet, the proposed regions and corresponding representation on committee would give these states significant ability to steer how the industry is "organized". Also, these regions are too large geographically to allow for good representation and address production practice differences. The above Growers in Ohio do not question the importance of food safety, so let's work on a food safety accord and not a marketing agreement. Too many have stated that signing this marketing agreement would give a competitive advantage over those that do not. Are we as an industry trying to achieve a competitive advantage with the agreement or a safer supply of leafy vegetables?

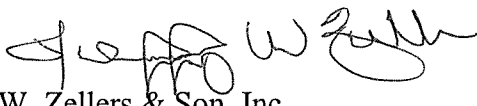
Ex. 65

In closing, the above Ohio Leafy Greens Growers would like to be part of an industry that develops a set of metrics that are based on scientific data, takes into account differences in production practices regionally, and gets that cart behind the horse and not in front. Put these metrics into an agreement that takes all of this into account and call it what it is, a food safety agreement. However, in its' current form we are opposed to adoption of this agreement.

Sincerely,

Buurma Farms, Inc.
Bruce Buurma, President

The Chef's Garden, Inc.
Bob Jones



K.W. Zellers & Son, Inc.
Jeffrey W. Zellers, President

Michael Farms, Inc.
Scott Michael

Wiers Farm, Inc.
James Wiers, President