

Testimony of James Graiff

National Leafy Greens Marketing Agreement Hearings

Docket No. FV09-970-1

Syracuse, New York

October 20, 2009

Thank you for the opportunity to present testimony today. My name is James Graiff. I am a partner with my brother and mother in Dan Graiff Farms located in Newfield, New Jersey. We farm 250 acres in New Jersey and contract 150 acres in Florida, plus purchase produce from Canada, New York, and California. All farms are third party audited by either USDA Good Agricultural Practices & Good Handling Practices Audit Verification Program or Primus Labs. We produce and handle baby spinach, baby arugula and operate a small fresh cut packing operation. According to the Small Business Administration classification we would be a small grower and a small handler.

I also today represent the Vegetable Growers Association of New Jersey with its 1298 members. Our production season for leafy greens is from March to the end of November. Most of this production goes through the wholesale trade with lesser amounts for fresh cut and direct sales to consumers.

New Jersey, like most of the Northeast and Mid-Atlantic States, is not home to sprawling farms encompassing thousands of acres. In fact, the average size of New Jersey farms is 71 acres, with the largest single group being between 10 and 49 acres.

New Jersey has been in the forefront in the Mid-Atlantic and Northeast in promoting food safety through collaborative efforts of the New Jersey Department of Agriculture and Rutgers Cooperative Extension. To date approximately 1,500 New Jersey fruit and vegetable growers have been trained in food safety practices with many operations passing third party audits.

We support having a standardized food safety audit as long as it fits the environment in which they are being used. There are a few areas of concern related to this proposal.

1. Will this take the place of other audits and "super metrics"? It appears that the bar for audits continually goes up and in some cases it is one firm saying their audit is better than the next. In a recent study from Canada, approximately 95% of all information requested on the different audits was the same. It does not appear that this marketing agreement precludes a buyer asking for more audits. We strongly support USDA being the auditing agency for the NLGMA and would like it to be the auditor for all commodities.
2. The makeup of the zones – How were these zones structured? It does not appear that environment or growing practices are taken into consideration when proposing the five zones. Who would think that Florida and New England has the similar climates or Georgia and Ohio? It would make more sense to place Maryland north and west to Michigan in one zone and

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Maryland south and west to the Mississippi river in one zone. Zones should be realigned before proceeding with the proposal.

3. We are glad to see there is a technical committee which will recommend the metrics for audits. We request that the technical committee appoint, instead of encouraging them to do so, a subcommittee within each zone to provide advice and suggestions on the metrics which would have direct impact on that zone.

Thank you for giving me the opportunity to testify at this hearing.