



October 14, 2009
USDA's Agricultural Marketing Service
Administrative Law Judge

**RE: Proponent Testimony for the Proposed National Leafy Greens
Marketing Agreement No. 970**

My name is Alex Jack and I represent Jack Brothers, Inc. I am currently the third generation in the Jack family to farm. I am the President of our family farm, which is located in Brawley, CA.

Our family farm, Jack Bros., is 100% behind the National Leafy Greens Marketing Agreement. We treat all of our vegetable crops with the same intensity and cleanliness as our leafy greens. Our food safety program costs have ranged from a high the first year of \$ 40.00 per acre, to a cost of \$ 32.00 per acre this year. As farmers you are constantly looking to trim cost and increase production, and paying these extra costs are not enjoyable, but necessary. We view the cost of food safety as "Insurance". Nobody likes to pay his or her insurance bill, but you're sure glad to have it when disaster strikes. Disaster in this instance is a product recall on one of your products, which may have inadvertently become contaminated. A modern day product recall can easily surpass \$ 1,000,000.00.

What has happened to our industry on several occasions, is a grower or shipper of a particular commodity may have a product recall, and the actions from one grower sends shock waves to all growers of that particular commodity. If consumers hear of contamination in product "A" from shipper "B", all they hear is don't eat product "A", regardless what state or even what country it comes from.

Each growing region has their own areas of concerns; it could be their water source, wild animals, or varmints. No matter the area of concern, each grower must have a plan to substantially reduce the threat of product contamination. We not only owe it to our families and ourselves, but to all consumers of America's vital food chain.

Thank you,

Alex Jack

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