



Quality Fruit and Vegetables • Wholesale/Retail
1100 Reeves Road • Baldwinsville, NY 13027
Phone: 315-635-3357 • Fax 315-638-0894

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My name is Brian Reeves from Reeves Farms and we grow about 300 acres of fresh market vegetables in Central New York. While I'm in favor of having national policies for food safety so we are all playing on a level field, I have some concerns about the proposed marketing agreement.

1. The zones would be better grouped by climate, topography etc.. New York conditions have more in common with Michigan, Wisconsin and Ohio than with South Carolina, Georgia and Florida. This is very important when developing metrics for audits.
2. The makeup of the committee is skewed more toward handlers instead of producers. Producers have better firsthand knowledge of GAPS critical points and effective ways to implement practices. Handlers may have a tendency to set the metrics higher than is necessary for producers to follow.
3. While a national agreement may help address "audit fatigue", the fact that this agreement only deals with leafy greens could have the opposite effect on diverse farms such as ours. I would hope that common sense would prevail in developing metrics for other crops so duplication of efforts does not occur.
4. There should be no exemptions from food safety documentation. Differences in production methods should be allowed for in the development of metrics because "one size doesn't fit all" can refer to types of operations as well as the size of an operation.

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