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Mr. David L. Priester
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Standardization Section
Fresh Products Branch
Fruit & Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Room 1661 South Building, Stop 0240
Washington, DC 20250-0240

Dear Mr. Priester:

**Re: United States Standards for Grades of Field Grown Leaf Lettuce
Docket #FV-04-303**

The North American Perishable Agricultural Receivers (NAPAR) is a national trade association located in Washington, DC, representing independent produce wholesale receivers. NAPAR members are predominantly small businesses with combined annual sales in excess of \$4 billion. NAPAR formed an operating alliance with the Food Marketing Institute in 1999, enabling it to function independently while expanding the services to its members.

On behalf of our members, I appreciate the opportunity to submit comments to USDA and hope our perspective is helpful in determining the need to develop a U.S. Grade Standard for Field Grown Leaf Lettuce. NAPAR surveyed members on the probable impact this proposed grade standard would have on their business operations. In response, we received several observations and concerns from our members.

Tolerance Percentages

Section 51.3764 Tolerances in the proposed U.S. Grade Standard for Field Grown Leaf Lettuce lists the following tolerances:

- Defects – 12% for plants that fail to meet the requirements of the grade
- Not more than 6% for plants affected by serious damage
- Not more than 3% for plants affected by decay.

Our members see no reason why the tolerances for Field Grown Leaf Lettuce shouldn't be the same as those currently listed in the U.S. Grade Standard for Greenhouse Grown Leaf Lettuce, which are: 10% damage, 5% serious damage and 1% decay. This becomes particularly important on occasions when Good Delivery Standards are applied, increasing the tolerances to 15% damage, 8% serious damage and 3% decay.

Russet Spotting

Russet Spotting is a problem that occurs in Field Grown Leaf Lettuce with enough frequency that it should be specifically addressed in this area. We, therefore, propose adding the following language to the respective sections.

51.3771 Injury:

Add (I) Russet Spotting – Present in any degree

51.3772 Damage:

Add (I) Russet Spotting – When exceeding 3 spots on one leaf, or any amount on 2 or more leaves

51.3773 Serious Damage:

Add (I) Russet Spotting – When any amount is present on 4 or more leaves

Our members believe that well-defined standards for field grown leaf lettuce will improve consistency of delivered product and enhance the relevance and effectiveness of USDA inspections.

I hope these insights are helpful. Please feel free to contact me directly if NAPAR can provide further assistance during this process.

Sincerely,



Patrick A. Davis
President