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Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Ave., S.W.  
Room 1661 South Building, Stop 0240  
Washington, DC 20250-0240

Dear Ms. Emery:

Re: United States Standards for Grades of Table Grapes  
Docket # FV-06-304, Fed. Reg. 1/24/06, page 3818-3819

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 again submit comments to USDA and hope our perspective is helpful. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. Those members responding expressed several concerns about the viability of the proposal.

The petitioners reported having conducted consumer research on customer acceptance of table grape shatter and base their argument on its conclusions, which indicated that 81 percent of surveyed consumers rated grapes with 10-percent shatter as good to excellent and with no negative impact to retailers or consumers. This would have been fine, if the proposal limited the amount of shatter at destination to 10 percent. It does not. The proposal, in its full context, limits shatter to 22 percent at destination and, when taking into account regularly applied PACA Good Delivery Standards, the total allowable percentage would reach a staggering 25 percent. I have to wonder what the

consumers who participated in the survey would say about finding 25 percent shatter in their consumer container.

The current U.S. Grades require grapes to be firmly attached to capstems because shatter is often an indicator of age, or shelf life. Bunches containing an overabundance of shattered berries are typically older than those bunches with fewer shattered berries.

Receivers are particularly concerned about grapes in poly bags. These seem to offer very little protection for bunches and contribute to the rate of shattered berries en route. In conclusion, we continue to see no reason to provide a special allowance for shattered berries in consumer containers for en route or at destination. The proposed allowance will enable more lower-quality product to qualify for the U.S. No. 1 grade.

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

Sincerely,



Patrick A. Davis  
President