



December 22, 2004

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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 Watermelons
Docket #FV-04-306
Issued in the Federal Register/Vol. 69, No. 209/October 29, 2004/Page 63133

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 necessary revisions to the U.S. Grade Standard for Watermelons. NAPAR surveyed its members, soliciting their input on the probable impact these changes would have on their business operations. In reviewing comments from responding members, it is clear they support the creation of a definition for seedless watermelons to the U.S. Grades for Watermelons, but they believe the proposed definition is far too lenient. Our members do, however, support the proposed size requirements for watermelons.

Seedless Watermelons

Our members feel strongly that the term "Seedless Watermelon" clearly implies to the end consumer that the melon will be free of mature seeds. We understand, however, that while the goal is to provide melons that are free of mature seeds, larger size melons are more likely to have developed a few errant mature seeds. Therefore, we suggest that the definition for seedless watermelons be divided into two categories, Small and Large. Small seedless watermelons would include those weighing ten (10) pounds or less, and large would include those weighing more than ten (10) pounds. We offer the following substitute language in an attempt to define seedless watermelons accordingly:

"Seedless Watermelons" are watermelons which, if **ten (10) pounds or less**, contain **zero (0) mature seeds**, not to include pips/caplets, on the face of the melon which has been cut into four equal sections (one lengthwise cut and one crosswise cut). Watermelons of a size **greater than ten (10) pounds may have 4 or fewer mature seeds**, not to include pips/caplets, on the face of the melon which has been cut into four equal sections (one lengthwise cut and one crosswise cut)."

This definition, we feel, maintains the integrity of the seedless watermelon category while providing reasonable, meaningful parameters for larger melons to be included. It does not, however, permit watermelons containing an overabundance of mature seeds to systematically dilute the category. Our members feel strongly that a watermelon containing more than four visible mature seeds in a twice-cut melon, of more than ten pounds, should not be considered a "seedless watermelon." After all, if more than four seeds are visible on the cut faces, one must conclude that there will be many more mature seeds discovered in the eating process.

Proposed Size Requirements

Our members support the size requirements proposed by AMS that would require watermelons to vary by only 3 pounds above or below the stated average weight.

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