



March 27, 2006

Fax Transmission  
(202) 720-8871  
[FPB.DocketClerk@usda.gov](mailto:FPB.DocketClerk@usda.gov)

Cheri L. Emery  
Cheri.Emery@usda.gov  
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 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 submit comments to USDA and hope our perspective is helpful in determining if there is a need to proceed with a revision to the U.S. Grade Standard for Table Grapes. 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.

This proposal, to provide a separate 10 percent allowance for shattered berries in consumer containers for en route or at destination, would result in a serious dilution of the grade. While it's not surprising that the grower/packer community would want to expand the provisions of the present grades to allow such a wide disparity for shattered berries. This proposal be unfairly damaging to receivers.

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. This proposal would value loads of older grapes with 22 percent shatter the same as newer/fresher ones with very few shattered berries. This tolerance is again bumped up considerably in F.O.B. situations where Good Delivery Standards are applied - to a possible total tolerance of 25 percent.

So, under this proposal, consumers purchasing table grapes in a consumer pack shouldn't be surprised to open the container at home and find up to 1/4 of the grapes rolling around in the bottom of the container. What does this say to the consumer? It says the grapes are not particularly fresh; the shelf life will be short; that someone might have dumped loose grapes into the pack; and it says that this was a wasteful purchase. After all, what do consumers do with shattered grapes? Do they go ahead and serve them to their families even though the stem seal has been broken for an unknown period of time, or do they toss them in the trash? Somewhere along the way, someone will endure additional shrink. If it's the consumer, they'll be very careful where they buy their next purchase of table grapes in a consumer pack.

While these are overall concerns for all table grapes in consumer packs, 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. In conclusion, we see no reason to provide a special allowance in any percentage for shattered berries in consumer containers for en route or at destination. Any special allowance for this purpose will only serve to dilute the grade standard.

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