



October 27, 2009

The Honorable Thomas Vilsack
United States Department of Agriculture
1400 Independence Ave., SW
Washington, DC 20250

Dear Secretary Vilsack:

On behalf of over 6500 farmers and farm families who are members of the Massachusetts Farm Bureau Federation, I am writing to oppose the Leafy Green Marketing Agreement (LGMA) as published in the February 3, 2009 Federal Register.

The LGMA simply does not work for small farming operations. The cost of compliance, particularly recordkeeping requirements, cannot be absorbed by small operations as readily as they can by large operations. The average farm size in Massachusetts is approximately 100 acres. Growers here estimate the cost of compliance with the LGMA between \$80 to \$100 per acre. This is a much more significant than the \$25/acre estimated for large operations. While we recognize that participation in the LGMA would be voluntary, its existence would by default result in many wholesale and institutional buyers mandating that their suppliers be compliant with the LGMA. This will push small producers out of these markets, and in some cases, out of business.

My organization and its member understand the importance of food safety. We also understand that the public and lawmakers are demanding greater accountability and attention paid to food safety, particularly leafy greens. We would also note that these same parties are demanding greater access to locally grown, fresh produce. Both you and Deputy Secretary Merrigan have purported to support local agriculture with efforts such as:

- The announcement of \$230,000 in funding to assess the capacity of the northeast to produce enough local food to meet market demand, rather than relying on food from long distances.
- Know your Farmer, Know Your Food

Approval of the LGMA is in direct conflict with these efforts. Its passage will result in a decrease in the capacity of the northeast to grow its own food, and it will result in fewer farmers for the public to know.

In short, the LGMA is bad for small farms. The Federal Register that USDA drew attention to the fact that both organic and conventional producers supported the LGMA. When looking at the

list of supporting organizations however, it is very clear that they represent large farming interests. Small farms have consistently spoken against the LGMA.

I urge you to support local agriculture by rejecting the LGMA, and putting provisions into place that treat small farming operations equitably.

Sincerely,

A handwritten signature in black ink, appearing to read "Alex Dowse". The signature is written in a cursive, flowing style.

Alex Dowse
President, Massachusetts Farm Bureau Federation

CC:
Deputy Secretary Kathleen Merrigan
Antoinette Carter, USDA , AMS
Melissa Schmaedick, USDA, AMS

