



My name is Amy Kunugi (Kunugi is spelled K-U-N-U-G-I).

My testimony is in support of the National Leafy Greens Marketing Agreement.

I am the General Manager of Southern Colorado Farms, Nature Fresh Organics, and SemTec, LLC, a large farming operation in the San Luis Valley of Colorado. I have grown with this company for 13 years; and worked within the produce industry for over 20 years. Annually, my company produces between 1,000 and 2,000 acres of iceberg lettuce, Savoy spinach, Romaine lettuce, cabbage, and spring-mix. 40% of our total acreage is certified organic, and we have grown Leafy Greens organically as well. My farm is considered, by SBA definitions, a large growing operation.

As a participant in California's Leafy Greens Marketing Agreement for the last three years, I have seen this program in action. The California LGMA has resulted in a new focus on food safety in which we as growers/handlers abide by best practices that are consistent, specific, measurable and verifiable in the field. Historically, without uniform safety requirements, we are dependent on the safety practices of all other growers and shippers in the county, state and beyond. Outbreaks such as the *E. coli* outbreak in September 2006, affect the entire industry and we destroyed crops and experienced financial losses when consumers lost confidence in our industry to put forward the safest products possible.

The leafy green marketing agreements, governing fresh leafy greens in Arizona and California respectively assist us in doing just that. While they are voluntary programs; the requirements of those agreements are mandatory for all signatory handlers/shippers. Signatories undergo regular and random audits conducted by their state's department of agriculture based on specific good agricultural practices that are both protective and practical. Participation is renewed on an annual basis. Those enrolled handlers agree to purchase only leaf greens grown according to the accepted good agricultural practices.

As a signatory to the California Leafy Green Agreement, we believe we are less likely to be detrimentally impacted by the safety performance of another grower or shipper. We also believe we are effectively minimizing the potential for contamination and that the state LGMA's position the industry to engage directly with FDA and state public health agencies to facilitate the rapid identification and mitigation of any contamination as well as to refine the program with an eye towards continual improvement.

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The implementation of the California and Arizona Leafy Green Marketing Agreements provides our buyers with a science based safety program. They now know the full scope of what we look for, test and monitor when implementing food safety programs and can have confidence that our efforts are consistently and constantly verified by state government inspectors. While some buyers still have unique requirements, the marketing agreement has fostered consistency in safety requirements.

With approximately 90 percent of all leafy greens already being covered by the CA or AZ LGMA, the implementation of a national marketing agreement should bring about nominal incremental costs for both growers selling to handlers and handlers who are signatories of those states' agreements. Involvement in a national program could be financially beneficial with improved buyer and consumer confidence.

I do not expect our costs to increase significantly under the National Leafy Greens Marketing Agreement since we have already made the necessary investments to comply with the California and Arizona Leafy Greens Marketing Agreements. The addition of a national agreement will not result in additional personnel, capital or testing costs.

My experience with the California/Arizona Leafy Greens Marketing Agreement has been positive and I would expect the same kind of experience nationally. This national agreement will bring the same standards to all companies growing, packaging, or selling leafy greens across the U.S. This is a huge leap forward for product safety. With national standards in place, industry buyers can now see the issues on food safety much more clearly and thus address these issues with a consistent and cost-effective direction or plan.

I would therefore like to go on record as supporting the National Leafy Green Marketing Agreement which should bring standardization across the country to our industry that will improve all aspects and phases of growing, handling, processing and shipping, thereby allowing consumers, the final end users, confidence and trust in these nutritious products.