

USDA TESTIMONY

My name is Jane Bedrosian Asmar. I appreciate the opportunity to testify as a member of the Raisin Administrative Committee.

Background.

I am a graduate of the University of Southern California and I currently serve as the Senior Vice President of Sales and Marketing of National Raisin Company, a raisin processor located in Fowler, California. Although I am employed in the processing industry, I am testifying here today as a proud representative of our nearly 3,000 growers of "California Raisins".

My family has been growing raisins for over eighty (80) years, with each generation working in the family business. I have been fortunate to grow up learning each aspect of raisin farming – from planting to marketing to delivery. Our family's industry experience grew broader when my dad and his brothers began National Raisin Company almost 50 years ago. Their aim in starting National Raisin Company was to provide growers with an efficient and profitable way to get their raisins to market.

Because I have spent my entire life in the raisin industry, I am familiar with the opportunities and challenges faced by our growers and this experience helps strengthen my testimony today. In this regard, I am here to advocate for the proposed amendment to Section 989.91 which requires a periodic vote to ascertain whether continuance or termination of the Federal Marketing Order 989 is favored by our growers.

The Proposed Amendment.

As set forth in Section 989.91(c), the proposed amendment requires a vote: "*[n]o less than five years and no later than six years [after the effective date of the amendment] to ascertain whether continuance of [the marketing order] is favored by the producers*".

Simply stated, the amendment provides each of our growers the opportunity to vote on the continuance or termination of Marketing Order 989. Without this amendment, our growers have no ability for periodic continuance referenda. The fact there is no language providing for this process has left our growers with absolutely "no voice" since the last vote for continuance held more than a quarter-century ago.

During my time in the industry, I have seen markets change quickly and significantly. Accordingly, our growers need maximum flexibility to adapt to market conditions. If the order still makes business sense, then growers need to ability to vote for a continuance. Conversely, if the order is hurting our growers in the market, then growers must be able to vote for termination as allowed by the timing procedures in the proposed amendment. In other words,

the growers who are helped or harmed by the order must have the direct ability to vote on the issue of whether it continues or terminates. Please know that my goal here today is not to argue against or for continuance or termination but rather I want to stress to the USDA that our growers must have the ability to decide for themselves. The amendment does this by allowing growers to vote and therefore provides them with the ability to have more control of their business and ensures that each grower can participate in the democratic process of a referendum.

Please know that I also support the amendment because it creates no significant cost to our growers or the USDA. Although there will be certain administrative costs associated with outreach, education and other related voting activities, these costs are minimal compared to the voting benefits received. Further, the timeframes set forth in the amendment – specifically, every six years after the initial referendum – ensures that the costs involved with the amendment will not be incurred annually. I recognize that costs are always a concern but this amendment does not result in a significant burden on either our growers or the USDA.

I also think it is important to note that the proposed amendment follows well-established USDA policy. As you know, USDA policy confirms there is a need to periodically review whether any order is favored by the applicable growers. Currently, there is no method in Marketing Order 989 to meet this policy. However, the proposed amendment can help bring the order in line with USDA policy by ensuring a vote to determine whether it meets our growers' current needs.

In summary, the proposed amendment to Section 989.91 provides our growers with a long-overdue vote concerning the order. The ability to vote is paramount and provides our growers with the best opportunity to achieve in a highly competitive raisin market. The amendment results in no significant costs and, if approved, would ensure compliance with the USDA policy of periodic review of the effectiveness of Marketing Order 989. Accordingly, I respectfully ask that Section 989.91 be amended as proposed.

Thank you.