

Exhibit 29

Testimony of Phillip Arnold

My name is Phillip Arnold, spelled P-h-i-l-l-i-p A-r-n-o-l-d. I live and work in the Mesilla Valley, near Las Cruces, New Mexico.

I have attached my resume to this Testimony for your reference. Briefly, I have been in the pecan business full time for 31 years after spending four years in the meat business. I have interests in three pecan businesses. The first is about 350 acres of pecans. Of this, 65 acres is our original family farm that was planted by my father 45 years ago and over the years we have added around 85 more to total about 150 that we own. In addition we lease approximately 200 more acres of pecans. All of this acreage is of improved varieties. Three generations of the Arnold family have worked in this business. I am aware of the Small Business Administration guidelines for a small grower – less than \$750,000 in annual gross revenue. Most years our farm would have been a small business but last couple of years we would have been considered a large pecan grower.

The second pecan business I have an ownership interest in is a custom pecan harvesting and a custom pecan cleaning business. Many of the small pecan farmers in our area cannot afford the expensive machinery to manage the pecan harvesting and pecan cleaning functions. These farmers pay us a fee per pound to shake their trees, gather their nuts off the ground, transport their nuts to our cleaning plant and clean their nuts. The owners of the nuts then decide who they want to sell their pecans to, and when. We never take title to these pecans and we just charge them a service fee to do this work. If our group, or a group like ours, were not around these growers may not be able to efficiently harvest their pecans and get them ready for market.

I have read §986.19 of the proposed Federal Marketing Order, the “To Handle” definition. It says:

To handle means to receive, shell, crack, accumulate, warehouse, roast, pack, sell, consign, transport, export, or ship (except as a common or contract carrier of pecans owned by another person), or in any other way to put inshell or shelled pecans into any and all markets in the stream of commerce either within the area of production or from such area to any point outside thereof. The term "to handle" shall not include: sales and deliveries within the area of production by growers to handlers; grower warehousing; custom handling (except for selling, consigning or exporting) or other similar activities paid for on a fee-for-service basis by a grower who retains the ownership of the pecans; or transfers between handlers.

The second sentence describes our custom harvesting and custom cleaning business. Our business provides "...custom handling...or other similar activities paid for on a fee-for-service basis by a grower who retains the ownership of the pecans...". I agree with the language of §986.19 that these fees for service should not be defined as handling.

The third pecan business I am in is as a buyer of pecans for San Saba Pecans, a large sheller as defined by the Small Business Administration (one having \$7,000,000 or more in gross revenue as a pecan sheller.)

I have a perspective of the pecan industry from a lot of vantage points, but certainly that of a grower, sheller and contract service provider.

I have been President of the National Pecan Growers Council, which is focused on MAP funding oversight, essentially promotion of pecans overseas. I was President of the Western Pecan Growers Association and I am currently President of the New Mexico Pecan Growers Association. As current President of the New Mexico Pecan Growers Association, I have sent a letter from our organization to the United States Secretary of Agriculture in support of the proposed Federal Marketing Order, a copy of which is also attached to this Testimony.

None of these three organizations, The National Pecan Growers Council, Western Pecan Growers Association, or New Mexico Pecan Growers Association, will compete with the

proposed American Pecan Council and their work. Actually, I think the American Pecan Council will allow each of these three organizations to operate more efficiently, as the industry starts to rely on the American Pecan Council to use its authorities to address: gathering and publish pecan industry data, research, promotion, collecting assessments, and reviewing and recommending changes to how we handle and package pecans. It will free our other pecan organizations to focus on their grower constituencies and the MAP issues.

Four years ago, I helped organize the first industry meeting in Frisco, Texas, that led to the formation of the American Pecan Board. Since its formation I have been extremely pleased with the intense two year, grass-roots efforts by all participants in the pecan industry – growers, shellers, and other handlers – to talk together and address our common opportunities through this proposed Federal Marketing Order. I think I have been well informed of all of the steps taken by the American Pecan Board to secure the proposed Federal Marketing Order and have had numerous opportunities to participate in this process.

I have listened to the testimony of Dr. Marco Palma and have reviewed the economic analysis summary prepared by Dr. Palma, specifically, the projected average price increase from promotion of 6.3¢ per in shell pound versus the average 2.5¢ per in shell pound cost for improved varieties. Overall, I am aware of the costs that a federal marketing order may impose on my grower and sheller interests, including the indirect costs of record keeping and funds transfer to the Council, but I do not believe those costs are unduly burdensome. Further, I believe that the benefits of the federal marketing order to my grower and sheller interests will greatly outweigh any costs associated with it.

I think my grower and sheller interests would also benefit in the future from grade, size, quality, packaging, shipping protocols, and other handling requirements as we compete with

other tree nuts for shelf space and United States consumer attention. I understand this will only occur after the Council receives and debates these issues.

I also understand that under the proposed order, only growers with more than thirty acres of pecans or more than 50,000 pounds of average production per year over the last four years will be allowed to vote on the proposed order. In my opinion, this threshold is reasonable because a grower that does not meet this threshold is not a commercial grower. Any grower that is smaller than the proposed threshold could not justify the cost inherent in such a small production and is most probably merely a seller of pecans from older trees that happen to be on his or her property, a hobby farmer or one that does not plan to put all commercial inputs (fertilizer, water, etc.) on his farm. In my work as a fee for service harvester and cleaner, I see this all the time. Folks with a few acres that cannot afford the expensive farming and harvesting equipment. We built our custom harvesting and cleaning business in part on such non-commercial grower situations. But make no mistake, even though those growers may not have a vote, they will get to share in the burdens and benefits of the proposed FMO. But on balance, I think it is fair that these small, non-commercial growers are not getting a vote, pecan growing is simply not their livelihood.

I also understand that only shellers that handle more than one million pounds of in shell pecans per year will be allowed to vote on the proposed order. I believe this is also a fair threshold. Lots of folks shell pecans. For some it is just enough for a pecan pie or for others it is just enough to sell in small packages at a convenience store, but these are not commercial shellers. I am not aware of any sheller in my area which handles less than one million in shell pounds per year that is in the commercial shelling business. Further, if there is such a sheller, I do not believe it would be commercially viable business because such a small operation could

not invest in the required equipment, pay employees and turn a profit on such a small production. It just would not be sustainable as a business at that level.

In conclusion, as a person with both grower and sheller interests as well as the current President of the New Mexico Pecan Growers Association and a member of and past President of both the Western Pecan Growers Association and the National Pecan Growers Council, I fully support the proposed Federal Marketing Order for pecans and encourage the United States Secretary of Agriculture to implement the order as proposed by the American Pecan Board.

I would be glad to answer any questions anyone may have.

Phillip B. Arnold

Born: 11/20/55 in Las Cruces, NM and grew up on family farm there.

Education: Graduated from Mayfield H.S. in Las Cruces, NM May 1973.
Graduated New Mexico State University with B.S. in Animal
Science in May 1980.

Family:

Career: June of 1980 to March 1982 worked for Iowa Beef Processors in
Dakota City, Nebraska. Quality control Processing Supervisor.
April 1982 to March 1984 worked for Monforts of Colorado

In 1984 he moved back to NM and entered in to the Pecan business
with his two brothers as partners in Arnold Brothers. They were the
third generation to farm the family farm. Arnold Brothers is also
a custom pecan farming business in the Las Cruces area that
currently farms in excess of 350 acres, as well as, harvest, cleans,
and handles an additional 650-700 acres annually.

In 1991 became pecan buyer for San Saba Pecan based out of San
Saba, Texas. He currently is the Western regional buyer for San
Saba Pecan dealing with Growers in New Mexico, Arizona, West
Texas and Mexico. He also has been working with export of inshell
into China since 2006

Positions: National Pecan Growers Council- Vice President 2008-2010
President 2010-2012. MAP Funding Oversight committee member
2011 to present.

New Mexico Pecan Growers Association- President 2010-present
Vice-President-2002-2009

Western Pecan Growers Association- Board of Directors 1998-
present. Was President 2006-2008

New Mexico Farm & Livestock Bureau- Second Vice President
2002-2008



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June 11, 2015

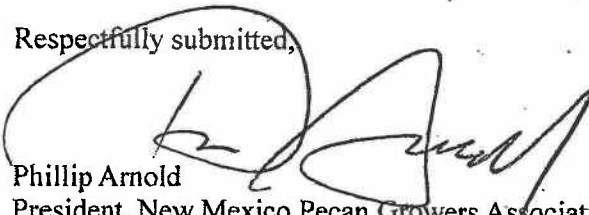
The Honorable Tom Vilsack
Secretary of Agriculture
1400 Independence Avenue, S.W.
Room 200-A
Washington, D.C. 20250

Dear Secretary Vilsack:

The New Mexico Pecan Growers Association is writing you in support of the Federal Marketing Order for Pecans, currently being promulgated by the American Pecan Board. Our industry has, and continues to face, issues of price and supply instability in the market. This situation inhibits our efforts to provide a consistent quality supply of pecans to domestic consumers at a price that supports a profitable return to producers and processors. We believe that a Federal Marketing Order will contribute to a more stable market environment that is favorable to growers, buyers, shellers, and consumers.

The Board of Directors of the New Mexico Pecan Growers Association, goes on record in favor of the Order, and greatly appreciates your support.

Respectfully submitted,



Phillip Arnold
President, New Mexico Pecan Growers Association

Cc: The Honorable Edward M. Avalos
Office of the Under Secretary
Marketing and Regulatory Programs
U.S. Department of Agriculture
Jamie L. Whitten Federal Building
1400 Independence Avenue, S.W., Room 228-W
Washington, D.C. 20250

The Honorable Anne L. Alonzo
Administrator
Agricultural Marketing Service
U.S. Department of Agriculture
South Agriculture Building
1400 Independence Avenue, S.W., Room 3069
Washington, D.C. 20250