



The World's Favorite

Sun-Maid Growers of California

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The Honorable George Miller
United States House of Representatives
2205 Rayburn House Office Building
Washington, DC 20515

Re: Improving Diets of Americans, Buy American Program

Dear Mr. Miller:

Sun-Maid Growers of California strongly supports the current national effort aimed at improving the diets of Americans. Over the years, schools and governmental feeding programs have not always been able to access products that help reduce obesity and encourage healthy eating for young and old alike. The consumption of traditional dried fruit can play a key role in the effort. We would like to share our positions on several matters and seek your support.

Maintain the eligibility of dried fruit in all school meal and snack programs and in the WIC program - Traditional dried fruit, like raisins, dried plums, figs and dates are nutritionally dense, shelf stable, have no shrinkage and are always available as an alternative to fresh fruit in all governmental meal, snack and feeding programs. Traditional fruits contain no added or infused sugars and have essentially the same nutritional food values as their fresh counterparts, only without the water. Additionally, when compared to many processed snack foods offered in schools and, when considering the Administration's national goal to reduce childhood obesity, traditional dried fruit is an all natural alternative, contains no fat and has no added salt.

Dried Fruit/Raisin Participation in USDA Programs – Currently, there is a prevalent USDA theme for schools to participate in the “buy local” and “know your farmer, know your food” programs. While such messages appear harmless in thought, they clearly have nutritional and practical limitations. Certain nutrient dense, natural products which are only produced in one area of the United States, like traditional dried fruits, yet are sought nationally by school nutritionists and other federal feeding programs, can be restricted for purchase. Simply, California school districts would be able to access an abundance of raisins or other traditional dried fruit, yet other school purchasers throughout the country would be able to access fewer dollars for those same products. Conversely, sellers of traditional dried fruit would not be able to compete on a level playing field by selling to schools throughout the nation if those schools are incentivized to “buy local” products.



Another element we question under the “buy local” and “know your farmer, know your food” themes is the fact that implementing such programs displace existing providers of fruits and vegetables produced on now what could be considered “non-local” farms. If the Department is to provide incentives for schools to “buy local,” is it in turn going to compensate those farmers whose sales are displaced by such actions? There is nothing prohibiting schools from presently buying local without a special program. We believe buying local should be defined as purchases of fruits and vegetables produced within the borders of the United States and its territories. Please consider instead the theme, **“Buy Local, Buy American, Buy Healthy!”**

Compliance with the Buy American requirement – State agencies have an obligation to ensure that purchases under the Child Nutrition Programs and by School Food Authorities adhere to the Buy American requirement. While it is clear the language of the requirement states “...the Department shall require that a school food authority purchase, to the maximum extent practicable, domestic commodities or products,” the compliance with the requirement is highly questionable. Fresh fruits and vegetables produced in the United States are seasonally available to schools. Essentially, when they are not available, schools could purchase non-domestic produce for their students. This action would seem inconsistent with the intent of the Buy American program which is to encourage the consumption of domestic products. The program should be modified to require the purchase and consumption of fruits and vegetables in all forms which would include fresh, dried, canned and frozen.

We believe the spirit of the Buy American program can be maintained and conformity take place by implementing the following compliance steps and modifying the requirement as shown below:

- Include a Buy American clause in all procurement documents including product specifications, bid solicitations, requests for proposals, purchase orders, etc.
- Monitor contractor performance
- Require suppliers to certify the origin of the product sold to schools
- Examine product packaging for identification of the country of origin
- Change the language in the Buy American requirement to state “...the Department shall require that a school food authority purchase, to the maximum extent practicable, domestic commodities or products ***in all forms including fresh, dried, canned and frozen.***”

Thank you for your leadership and this opportunity to share a number of matters important to the traditional dried fruit industry. Please do not hesitate to contact us if there are any points we have not clearly covered.

Sincerely,



Barry F. Kriebel
President
Sun-Maid Growers of California