

Good morning Mr. Chairman, distinguished committee members and the assembled public. My name is Ron Ratto, and I am with Ratto Bros., Inc. from Modesto, California. Thank you for the invitation to appear today.

1. So who are we ?

Ratto Bros. takes its origin from 1905 when my grandfather Antone L. Ratto quit school at the age of 16, much to the chagrin of his mother, and went to work full time in the vegetable gardens of Bay Farm Island in Alameda, California. His father, uncles and grandfather were also all vegetables gardeners in the area of Alameda, West Oakland, East Oakland and Berkeley, and my grandfather spent his youth in their vegetable gardens and delivering produce with them.

2. What do we do today?

We remain in the same kind of vegetable business today, over 100 years later, doing basic food production. We grow food for people. We want to provide fresh, healthy, wholesome and low-cost vegetables to the communities where we live, to communities in California and beyond. We farm about 1,000 acres, growing a large variety of truck garden leafy green fresh vegetable crops such as Beets, Chard, Dandelions, Mustard Greens, Turnips, Parsley, Celery Root, Leaf Lettuces, and Cabbages.

3. Do we do anything unique ?

We grow lots of different kinds of crops, 35-40. We plant many of the crops weekly. We have small field sizes, usually from ½ acre to 3 acres in size. We have lots of fields and lots of crops growing at any one time. This creates a very busy and productive farm operation, with lots of activity. We have customers of all sizes, from the very large that order vegetables by the truck load, to the very small, ordering 5 to 10 boxes at a time.

We do many things ourselves instead of hiring them out. We farm on land we own. We grow the crops ourselves, we harvest the crops, we have our own cold storage, we do our own sales, we have our own mechanics shop and we operate trucks for delivery. We are vertically

integrated, in a 100 year newer version of how our ancestors operated. We bridge from the large to the small in many ways.

We invest. We invest in facilities, equipment and people. We invest in capacity. The last several years, we have invested in food safety capacity-the ability of people to implement, maintain, operate and improve food safety systems, and in systems infrastructure.

If we are unique, it might be in the complexity of our operation due to the number and mix of crops we grow, the multitude of activities we perform ourselves and the standards we hold ourselves to achieve.

4. Our experience, perspective and approach on food safety and the LGMA.

Our recent and current experience with food safety is with the California Leafy Green Marketing Agreement program. Our company food safety program and systems today are much more comprehensive than they were before the establishment of the LGMA program.

We believe the interest of food safety is implicit to our food production and must be an integral part of growing the vegetables that provide for our livelihood. We feel an obligation and responsibility to offer safe food products to our customers and to the consuming public. The food safety practices we follow do not occur without commitment and hard work, and as a company principal, I have regular involvement in our food safety program.

Commitment is essential and we are committed.

We chose to commit to the LGMA program and to adopt the LGMA guidelines and requirements as the core of our food safety program. We think that the public-private partnership between the leafy green industry and state and federal government brings the best from all realms to the program. Government oversight of the program provides another key feature to the program.

The LGMA program is a substantial food safety program and we had to gear up to meet its challenges. We had to design and re-design our internal systems to link up to the program guidelines and requirements, and then disperse the responsibilities within our internal systems.

Our approach is to fully integrate the program elements into our operational practices. The development and operation of a food safety program encourages communication between and among employees at all levels. Since food safety practices relate to all areas of our operation, employees in all areas are expected to contribute in their own particular ways to the overall program.

Even though we grow food in the outdoors, where there is the influence of wild life, human life, and weather, and where it is difficult to impose control on external variables, there is much we can do and do do in the way of farm practices that contribute to the production of safe food. We test water, we get ingredients documentation for soil amendments, we monitor surrounding lands and our own land for animals and environmental influences. We have health and sanitation Standard Operating Practices for our work force. And we follow many other procedures, guidelines and requirements.

Our food safety program relies on people. There are many food safety routines that must be performed daily. We try to strengthen our routines so that they are an expected, embedded, re-occurring part of our employee's daily work life.

We train and re-train employees, we check employees, we monitor internal systems, we self-audit, we talk about situations and we strive for perfection in our details. We can be perfect in what we do, and we sometimes are perfect, but we are not always. To attain perfection day after day, time after time, is a challenge, but that's what we strive for. And food safety seeks perfection.

This is all part of the "food safety culture" we are building.

And the test of our performance is in the audit verification program. We are motivated to do well and our employees take pride in their food safety achievements. These mandatory audits are performed by government inspectors, sometimes announced in advance, and sometimes unannounced and happen as walk-in inspections. Both types of audits make sure that we are complying with the program food safety standards.

Implementation of the LGMA program has moved our food safety practices to a much higher level, and we surmise it has moved higher the level of most others in the leafy green business as well.

5. Financial Burden

Is there a cost to food safety ? Yes, of course there is.

Should consumers have to pay extra for food safety ? Maybe not, but the reality is that the cost of food reflects all the various costs that go into its production, and ultimately the consumer must bear the total cost of food production. The costs of food production are a constantly changing blend of increasing and decreasing cost components, the total of which seems to keep rising over time.

For us, examples of the costs of food safety include (1) supplies, such as gloves and hairnets and chlorine test strips, (2) equipment, such as a chlorine pump, an ORP meter and stainless steel work surfaces, (3) laboratory tests, such as for micro-organisms, and (4) personnel, to administer and keep records of the food safety program.

Are the costs significant ? Yes.

Is it worth the expense ? Yes, because we want to take extra steps to produce safe food.

And while the cost of food safety might be measured in dollars, the value of food safety is almost immeasurable as it affects so many people every day, both producers and consumers.

And with that, at this point I would like to stop. I hope this testimony is useful to the committee, and I thank you again for the invitation to appear.

ADDITIONAL COMMENTS TO SUBMIT AS WRITTEN TESTIMONY

Comments: Features of the LGMA program that could be considered in food safety legislation:

Food safety program guidelines and requirements are based on known scientific and academic work.

Program entities develop and operate their own food safety programs to attain the program requirements.

State inspectors under USDA overview compose the audit staff.

Program entities are subject to periodic audits.

Program entities are subject to unannounced audits.

If audit deficiencies are found, they must be corrected.

Corrections of deficiencies are audited.

If a program entity has serious violations, it is subject to disciplinary procedure, including suspension and termination from the program.

The program will name names – serious offenders that are de-certified are named as such.

Comments: Other points to consider in food safety legislation:

Governance of food safety programs:

- Authorize food safety programs with shared collaboration, involvement, participation and responsibility between federal government, state government and industry
- Authorized national food safety programs to operate as US wide
- Prohibit individual state standards that would restrict the interstate movement or sale of food.

Scope of food safety legislation:

- Allow food safety programs for the production and harvest of food crops
- Allow food safety programs for the handling and distribution of food crops.

Determination of who should be subject to food safety legislation:

- Encourage inclusion of all commercial food producers
- Discourage exclusion or non-participation of selected groups of food producers

Standards and requirements:

- Do not set food safety practices by Act of Congress

- Allow food safety programs to establish processes to develop food safety standards that are flexible, efficient and open to industry and public participation.
- Allow food safety standards to be based on science and applied academic work
- Allow processes for the flexible revision of food safety standards to enable the updating and changing of guidelines, standards and requirements based on new knowledge,

Food safety program elements:

- Regulates, inspects and enforces food safety standards
- Provides training materials, resources and guidance to food producers on best practices and how to meet the standards or regulations
- Flexible implementation: Allow flexibility in how food producers meet food safety requirements.
- Audit function-verification of food safety practices by producers and handlers
- Determine audit scheme and frequency
- Establish process development, review and change to the audit scheme
- Announced and unannounced audits
- Timely follow-upon audit deficiencies
- Supervise auditor staff.
- Set qualification and performance standards for auditors.
- Administer audit results to subject entities.
- Develop and administer consequences system to food producers with poor audit performances or deficiencies.
- Identify research needs
- Investigate food contamination episodes and food related human illness outbreaks.
- Determine causes of outbreaks, write reports and make recommendations and changes to standards based on findings.

Committee on Agriculture
U.S. House of Representatives
Required Witness Disclosure Form

House Rules* require nongovernmental witnesses to disclose the amount and source of Federal grants received since October 1, 2006.

Name: RONALD A. RATTO
Address: 6312 BECKWITH ROAD MODESTO, CA 95358
Telephone: 209-545-4445
Organization you represent (if any): RATTO BROS., INC.

1. Please list any federal grants or contracts (including subgrants and subcontracts) you have received since October 1, 2006, as well as the source and the amount of each grant or contract. House Rules do **NOT** require disclosure of federal payments to individuals, such as Social Security or Medicare benefits, farm program payments, or assistance to agricultural producers: NONE

Source: _____ Amount: _____

Source: _____ Amount: _____

2. If you are appearing on behalf of an organization, please list any federal grants or contracts (including subgrants and subcontracts) the organization has received since October 1, 2006, as well as the source and the amount of each grant or contract:

Source: _____ Amount: _____

Source: _____ Amount: _____

Please check here if this form is NOT applicable to you: _____

Signature: Ronald A. Ratto

* Rule XI, clause 2(g)(4) of the U.S. House of Representatives provides: *Each committee shall, to the greatest extent practicable, require witnesses who appear before it to submit in advance written statements of proposed testimony and to limit their initial presentations to the committee to brief summaries thereof. In the case of a witness appearing in a nongovernmental capacity, a written statement of proposed testimony shall include a curriculum vitae and a disclosure of the amount and source (by agency and program) of each Federal grant (or subgrant thereof) or contract (or subcontract thereof) received during the current fiscal year or either of the two previous fiscal years by the witness or by any entity represented by the witness.*

PLEASE ATTACH DISCLOSURE FORM TO EACH COPY OF TESTIMONY.

Committee on Agriculture
U.S. House of Representatives
Information Required From Non-governmental Witnesses

House rules require non-governmental witnesses to provide their resume or biographical sketch prior to testifying. If you do not have a resume or biographical sketch available, please complete this form.

1. Name: RON RATTO
2. Business Address: 6312 BECKWITH ROAD
MODESTO, CA 95358
3. Business Phone Number: 209-545-4445
4. Organization you represent: RATTO BROS., INC.
5. Please list any occupational, employment, or work-related experience you have which add to your qualification to provide testimony before the Committee:
Employed by Ratto Bros. since 1975
member, Advisory Board, California Leafy
Green Products Handler Advisory Board.
6. Please list any special training, education, or professional experience you have which add to your qualifications to provide testimony before the Committee:
1973 Graduate of University of California
at Berkeley, B.S. from the College
of Agriculture
7. If you are appearing on behalf of an organization, please list the capacity in which you are representing that organization, including any offices or elected positions you hold:

PLEASE ATTACH THIS FORM OR YOUR BIOGRAPHY TO EACH COPY OF TESTIMONY.

Ron Ratto

Employment:

President, Ratto Bros., Inc. - 1998 to present.
Began employment with Ratto Bros. in 1975.

Education:

1973 graduate of University of California at Berkeley
B.S. from College of Agriculture

Organizations:

Member, Advisory Board, California Leafy Green Products Handler Marketing Agreement

Family:

Married to Catharine 28 years.
3 sons, ages 26, 24 and 22