

**USDA Agriculture Marketing Service Hearing:
Proposed National Leafy Green Marketing Agreement (NLGMA)
Hyatt Regency, Monterey, CA
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Thank you for the opportunity to share Wild Farm Alliance's (WFA) perspective on the proposed NLGMA. WFA is a ten-year old organization promoting a healthy, viable agriculture that protects and restores wild Nature. We have been drawn into this debate on food safety because of the conservation conflicts occurring with leafy green production on California's Central Coast.

The marketing of leafy greens to increase sales is a fitting undertaking for USDA AMS. However, it is questionable for AMS to be involved with a program that 'markets' food safety. Inherent contradictions between food safety and marketing occur within the CA LGMA. It is instructive to review these challenges since the CA LGMA will undoubtedly be used as a model if the NLGMA is created.

The CA LGMA's unstated guiding principle is to market the perception of safe food, rather than always basing decisions on the best science. Wildlife and ecosystems have suffered when perception and science have not been aligned. The USDA NRCS and other agencies and nonprofits have invested millions in farm conservation efforts that are now in jeopardy due to the CA LGMA and third party supermetrics.

Farmers are forced to choose between buyer's demands and stewardship practices that can improve food safety. UC Davis researches have shown that grasses and wetlands have the ability to filter up to 99% of *E. coli* during rain events.ⁱ It has long been known that windbreaks reduce dust. This is an important function if a source of pathogenic dust, such as a cattle loafing area, is nearby. Food safety and market perception conflicts arise when wildlife are targeted because they are attracted to habitat that can help to improve the safety of food.

On the surface, the CA LGMA seems much more reasonable than supermetrics because it only focuses on "animals of significant risk," which are defined as cattle, sheep, goats, feral and domestic pigs, and deer. In reality, a critical part of their metrics refer to all "animals."^{ii 1} Growers have reported to us that auditors penalize their farms for any animals present, not just those on the significant risk list. By having this loophole, the CA LGMA can market the perception that their products are safe to many buyers who demand zero risk. Yet, there is never zero risk in Nature.

Before the unfortunate *E. coli* O157: H7 spinach contamination in 2006, auditors were inspecting leafy green fields for the presence of small animals or other foreign objects that could be caught in the harvest and end up in the bagged product. It is obviously bad publicity for mouse or frog parts to be in salad mix. A UC Cooperative Extension paper reports that to date, rodents are not a food safety issue.ⁱⁱⁱ No studies have been done in California that shows amphibians carry human

ⁱ See Table 5. Animal of Significant Risk Activity in Field (Wild or Domestic) in CA LGMA metrics; July 2009